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FILED

JAN 10 2020

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CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE

9 Attorneys for Defendant ELIZABETH A. HOLMES

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION
14

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.
18 ELIZABETH HOLMES and
RAMESH "SUNNY" BALWANI,
19 Defendants.

) Case No. CR-18-00258-EJD-SVK

) MOTION FOR SEVERANCE

) FILED UNDER SEAL

) Date: February 10, 2020
) Time: 10:00 AM
) CTRM: 4, 5th Floor

) Hon. Edward J. Davila

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MOTION FOR SEVERANCE
CR-18-00258 EJD SVK

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MOTION FOR SEVERANCE

PLEASE TAKE NOTICE that on February 10, 2010, at 10:00 a.m., or on such other date and time as the Court may order, in Courtroom 4 of the above-captioned Court, 280 South 1st Street, San Jose, CA 95113, before the Honorable Edward J. Davila, Defendant Elizabeth Holmes will and hereby does respectfully move the Court pursuant to Rules 12(b)(3)(D) and 14 of the Federal Rules of Criminal Procedure to sever her case from that of her co-defendant, Ramesh Balwani, for trial. The Motion is based on the below Memorandum of Points and Authorities, the accompanying Declaration of Dr. Mindy Mechanic, the *ex parte* proffer of proof and accompanying exhibits, the record in this case, and any other matters that the Court deems appropriate.

DATED: December 16, 2019

/s/ Kevin Downey

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INTRODUCTION

Mr. Balwani is more than Ms. Holmes' co-defendant. For over a decade, Ms. Holmes and Mr. Balwani had an abusive intimate-partner relationship, in which Mr. Balwani exercised psychological, emotional, and [REDACTED] over Ms. Holmes. As detailed in the accompanying declaration of Dr. Mindy Mechanic, a clinical and forensic psychologist who focuses on intimate partner abuse and sexual trauma, [REDACTED]

According to Dr. Mechanic, [REDACTED]

[REDACTED]. Should that occur, Ms. Holmes may suffer a range of serious physical, psychological, and emotional effects, many of which would visibly affect Ms. Holmes' demeanor in the courtroom and hinder her ability to participate in the trial proceedings or communicate with counsel. Ms. Holmes' potentially debilitating PTSD symptoms would materially prejudice her ability to exercise fundamental trial rights, including her right to testify on her behalf, during the proceedings. They also would affect Ms. Holmes' demeanor in a way likely to compromise the jury's ability reliably to assess her guilt or innocence based on the evidence adduced at trial. The Court should thus grant severance under Rule 14 to safeguard Ms. Holmes' fundamental trial rights and to ensure the fairness and reliability of these proceedings.¹

BACKGROUND²

¹ Ms. Holmes does not oppose Mr. Balwani's separate motion for severance, which was filed under seal on December 3, 2019.

² Ms. Holmes provides a more detailed disclosure of anticipated evidence in a separate proffer of proof, which is being submitted under seal and *ex parte* because it contains sensitive information regarding Ms. Holmes' potential trial strategy. See *United States v. Carona*, No. CR 06-224, 2008 WL 1970221, at *1, *3 (C.D. Cal. May 2, 2008) (granting severance after *in camera* review of defendant's "declaration describing the nature of the testimony which she would seek to present in her defense"); *United States v. Blanchard*, No. 05-80355, 2007 WL 1976359, at *6-7 (E.D. Mich. July 3, 2007) (granting severance based on *in camera* review of document containing defendant's "proposed defense to the charges in the indictment" as well as "substance of [proposed] testimony"); *United States v. Lopez*, 915 F. Supp. 891, 901 (E.D. Mich. 1996) (granting severance based on "an *in camera* review of" affidavit submitted by defendant that "outlin[ed] her proposed defense to the charges in the indictment").

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Intimate partner abuse refers to “an array of abusive tactics that are deployed in the service of achieving control over an intimate partner.” *Id.* at 4. The “tie that binds” together these abusive tactics is “coercive control.” *Id.* at 7. Intimate partner abuse “is fundamentally about control, not physical violence, which is only one of its many tactics.” *Id.* at 8. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 [REDACTED] *Id.* at 13. This
2 pattern of abuse and coercive control continued over the approximately decade-long duration of Ms.
3 Holmes and Mr. Balwani's relationship, including during the period of the charged conspiracies.

4 As discussed by Dr. Mechanic, intimate partner abuse affects its victims' agency. Victims may
5 "capitulate to [their] abuser[s] in order to increase survival and reduce myriad potential risks of
6 continued or escalated abuse or violence." *Id.* at 7. "[I]n cases in which emotional dependency and
7 capitulation to the abuser have eroded autonomous expression of self, survival is experienced more as
8 emotional survival, and a victim may come to believe that she is unable to function without her partner."
9 *Id.* Coercive control "restricts an individual's agency and autonomy because capitulation with the
10 demands and expectations of an abuser is emotionally and/or physically safer than challenging those
11 demands or expectations which often results in violent escalation." *Id.* at 7-8. The defense identifies
12 some of the effects of Mr. Balwani's abuse on Ms. Holmes' agency and state of mind in the *ex parte*
13 proffer of proof.

14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 PTSD and its resulting symptoms are susceptible to triggers, including physical proximity to the
25 abuser. *Id.* at 14-15. As Dr. Mechanic explains, abuse victims "learn to be hypervigilant to their
26 abuser's demeanor, behavior, and emotions in the service of self-preservation," meaning that "subtle and
27 nuanced indicators, such as a glare across the room, . . . can readily function as a potent trigger." *Id.* at
28 14. Such a trigger can induce "perceptions of threat, danger, fear, and resulting numbness, heightened

1 anxiety or frozen fright.” *Id.* [REDACTED]

2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED] *Id.*; see also *United States v. Nwoye*, 824 F.3d 1129, 1137 (D.C.
6 Cir. 2016) (Kavanaugh, J.) (“women in battering relationships are often hypervigilant to cues of
7 impending danger” (internal quotation marks omitted)). [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 [REDACTED] In summary, should Ms. Holmes be
19 required to undergo a lengthy trial in the presence of Ms. Balwani, the likely physical, psychological,
20 and emotional effects on Ms. Holmes would be severe. Such effects not only would be apparent to the
21 jury, they also would prohibit Ms. Holmes from being fully attentive and responsive to the proceedings
22 at trial.

23 ARGUMENT

24 Federal Rule of Criminal Procedure 8(b) permits the joinder of two or more defendants who are
25 alleged to have participated in the same criminal offenses. “Although joinder is generally favored
26 because it promotes efficiency, Rule 14 provides that trials may be severed when it is apparent that a
27 joint trial would cause prejudice.” *United States v. Mayfield*, 189 F.3d 895, 899 (9th Cir. 1999) (citation
28 omitted). In *Zafiro v. United States*, 506 U.S. 534 (1993), the Supreme Court identified the two

1 situations in which a district court “should grant a severance under Rule 14” to avoid prejudicing a
 2 defendant. *Id.* at 539. Specifically, *Zafiro* held that severance is warranted when there is a “serious
 3 risk” that a joint trial would (i) “compromise a specific trial right of one of the defendants” or (ii)
 4 “prevent the jury from making a reliable judgment about guilt or innocence.” *Id.*

5 There is no one-size-fits all rule for establishing a defendant’s potential prejudice under *Zafiro*;
 6 rather, a district court’s inquiry will necessarily “vary with the facts in each case.” *Id.* On the unique
 7 facts of this case, requiring Ms. Holmes to be tried jointly with her abusive former partner would cause
 8 her significant prejudice. To start, a joint trial with Mr. Balwani—and the likely physical,
 9 psychological, and emotional effects it would trigger—would “compromise” Ms. Holmes’ “specific trial
 10 right[s]” to participate in her own defense, receive effective assistance of counsel, testify on her own
 11 behalf, and present a defense. On account of those physical, psychological, and emotional effects,
 12 moreover, a joint trial would present a serious risk of compromising the jury’s ability to judge reliably
 13 Ms. Holmes’ guilt or innocence. Ms. Holmes is therefore entitled to severance to protect her
 14 fundamental rights and ensure that she receives a fair trial.

15 **I. There Is a Serious Risk that a Joint Trial Would Compromise Ms. Holmes’ Specific Trial**
 16 **Rights**

17 **A. Ms. Holmes’ Rights To Participate in Her Defense and Receive Effective Assistance**
 18 **of Counsel**

19 Ms. Holmes, like all those accused of serious crimes, enjoys the fundamental right to “participate
 20 in the defense of [her] case” and to receive effective assistance of counsel. *Gonzalez v. Ptiler*, 341 F.3d
 21 897, 900 (9th Cir. 2003). To exercise those rights fully, an accused must maintain the “ability to
 22 communicate with [her] lawyer” during the course of the proceedings. *Deck v. Missouri*, 544 U.S. 622,
 23 631 (2005) (internal quotation marks omitted); *Ptiler*, 341 F.3d at 900 (discussing “Sixth Amendment
 24 right to confer with counsel”). Relatedly, she also must possess the “ability to follow the proceedings
 25 and take an active interest in the presentation of [her] case.” *Ptiler*, 341 F.3d at 900 (internal quotation
 26 marks omitted).

27 Both the Supreme Court and the Ninth Circuit have stressed the importance of minimizing the
 28 introduction of factors that would “confuse and embarrass defendants’ mental faculties and thereby tend
 materially to abridge and prejudicially affect his constitutional rights.” *Deck*, 544 U.S. at 631 (internal

quotation marks and alterations omitted) (quoting *California v. Harrington*, 42 Cal. 165, 168 (1871)). Courts have taken particular care to guard against in-trial conditions that “interfere with the accused’s ability to communicate with his lawyer,” *id.* (internal quotation marks omitted), or otherwise hinder a defendant’s “ability to follow the proceedings and take an active interest in the presentation of his case,” *Pliler*, 341 F.3d at 900 (internal quotation marks omitted). Applying that rule, for example, the Ninth Circuit has limited the use of stun belts to restrain defendants, reasoning that stun belts’ tendency to cause “significant psychological consequences” and a “chilling” of “those movements necessary for effective communication with counsel” poses a “substantial risk of interfering with a defendant’s Sixth Amendment right to confer with counsel” and her ability to participate in her own defense. *Id.* (internal quotation marks and alterations omitted); *see also United States v. Durham*, 287 F.3d 1297, 1305-06 (11th Cir. 2002) (stun belts render a defendant “less likely to participate fully in his defense at trial” because “much of a defendant’s focus and attention when wearing one of these devices is occupied by anxiety over the possible triggering of the belt”).

The prospective joint trial in this case presents an analogous threat of prejudice to Ms. Holmes’ trial-level rights – namely, the risk that Mr. Balwani’s presence and/or actions would trigger in Ms. Holmes significant psychological consequences that would materially prejudice her ability to communicate with counsel, follow the proceedings, and pursue a defense in her best interest. *See* Mechanic Decl. at 14-15. [REDACTED]

[REDACTED]. Needless to say, such physical and psychological effects, which would at the least “occup[y]” “much of” Ms. Holmes’ “focus and attention,” pose a substantial risk of interference with Ms. Holmes’ “ability to follow the proceedings and take an active interest in the presentation of h[er] case” and “confer with [her] counsel.” *Durham*, 287 F.3d at 1305-06; *see also Deck*, 544 U.S. at 631; *Pliler*, 341 F.3d at 900.

In addition, given the common behaviors exhibited by victims when in the prolonged presence of their former abusive partners, a joint trial presents the serious risk that Ms. Holmes would revert to a pattern of compliance with Mr. Balwani. [REDACTED]

1 [REDACTED] Mechanic Decl.
 2 at 15. The risk that Mr. Balwani, by virtue of his prior abusive relationship with Ms. Holmes, gains
 3 control of her decisionmaking at trial constitutes another risk that a joint trial would present to Ms.
 4 Holmes' trial rights.

5 **B. Ms. Holmes' Right To Testify on Her Own Behalf and To Present a Defense**

6 "The right to testify on one's own behalf in a criminal trial 'has sources in several provisions in
 7 the Constitution' and is 'essential to due process of law in a fair adversary process.'" *United States v.*
 8 *Carona*, No. CR 06-224, 2008 WL 1970221, at *3 (C.D. Cal. May 2, 2008) (quoting *Rock v. Arkansas*,
 9 483 U.S. 44, 51 (1987)). In addition, "the Constitution guarantees criminal defendants a meaningful
 10 opportunity to present a complete defense," including to present the defense of her own choosing.
 11 *Crane v. Kentucky*, 476 U.S. 683, 690 (1986). For two independent reasons, a joint trial presents a
 12 serious risk of compromising Ms. Holmes' fundamental right to testify on her own behalf, if she were to
 13 choose to exercise it (a decision that will depend on the government's proof at trial), and to present a
 14 defense. The serious risk of prejudice to these rights provides yet another reason to require severance.

15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED] Under Ninth Circuit law, Ms. Holmes' testimony about the abuse
 23 would be unquestionably relevant to Ms. Holmes' state of mind at the time of the charged conspiracy.
 24 See *United States v. Haischer*, 780 F.3d 1277, 1282 (9th Cir. 2015) (evidence regarding intimate-partner
 25 abuse of a defendant by her co-conspirator admissible to show that the defendant lacked the requisite
 26 mens rea to commit wire fraud); accord *United States v. Breinig*, 70 F.3d 850, 852 (6th Cir. 1995);
 27 *Dunn v. Roberts*, 963 F.2d 308, 311-13 (10th Cir. 1992); cf. *United States v. Lopez*, 913 F.3d 807, 820-
 28 23 (9th Cir. 2019) (cataloging the ways in which expert testimony on intimate partner abuse may be

1 helpful to a jury's evaluation of the facts and a defendant's credibility); *United States v. Nwoye*, 824
 2 F.3d 1129, 1140 (D.C. Cir. 2016) (Kavanaugh, J.) ("Expert testimony on battered woman syndrome
 3 could have helped [the defendant] dispel the ordinary lay person's perception that a woman in a
 4 battering relationship is free to leave at any time." (internal quotation marks omitted)).

5 Should Ms. Holmes choose to testify at trial, she could offer probative evidence—evidence
 6 including, but not limited to, testimony regarding the abuse she suffered while in an intimate-partner
 7 relationship with Mr. Balwani. Yet Mr. Balwani's presence, and its likely triggering effect on Ms.
 8 Holmes' PTSD, could well affect Ms. Holmes' choice about whether to testify and the content and
 9 presentation of her testimony. By posing a serious risk of harmful physical, psychological, and
 10 emotional effects, a joint trial thus threatens to "materially impair and prejudicially affect" Ms. Holmes'
 11 "privilege of becoming a competent witness and testifying in h[er] own behalf." *Pliker*, 341 F.3d at 900-
 12 01 (internal quotation marks omitted); *see also Gonzalez v. Pliker*, No. 01-cv-300, 2008 WL 11411353,
 13 at *8, *11 (C.D. Cal. Nov. 10, 2008) (defendant's right to testify prejudiced when evidence showed that
 14 defendant "wanted to get off the witness stand as quickly as possible," "hurried through his testimony,"
 15 and "offered many brief, one-word answers and did not elaborate because of his anxiety" of triggering
 16 stun belt). That prejudice, in turn, provides a sufficient basis for granting severance under *Zafiro*.

17 *Second*, were a joint trial to proceed, Mr. Balwani would likely seek to exclude or limit the
 18 testimony regarding his abuse of Ms. Holmes on the basis that doing so would be necessary to guard
 19 against any resulting prejudice to his rights.³ *See* Fed. R. Evid. 403. Under *Zafiro*, however, a joint trial
 20 presents a risk of prejudice "if essential exculpatory evidence that would be available to a defendant
 21 tried alone were unavailable in a joint trial." 506 U.S. at 539. It is thus no surprise that, when faced
 22

23 ³ *Cf. United States v. Blunt*, 930 F.3d 119, 124-27 (3d Cir. 2019) (severance necessary because
 24 wife's testimony of co-defendant husband's "threatened and actual violence," which would have been
 25 inadmissible against husband in separate trial, "tend[ed] to elicit an inappropriate emotional response
 26 from jurors, resulting in unfair prejudice"); *Breinig*, 70 F.3d at 853 (severance necessary where
 27 defendant's testimony in support of her state-of-mind defense, including statements that her co-
 28 defendant husband was "adulterous, mentally abusive, and manipulating," allowed the jury "to hear and
 evaluate . . . impermissible and highly inflammatory evidence of [the husband's] bad character"); *accord*
United States v. Lopez, 915 F. Supp. 891, 901 (E.D. Mich. 1996) (granting severance on similar
 grounds); *United States v. Rivera-Ruperto*, No. 10-344, 2012 WL 898795, at *1-2 (D.P.R. Mar. 15,
 2012) (same); *United States v. Swan*, No. 12-cr-27, 2013 WL 3422022, at *4-5 (D. Me. July 8, 2013)
 (same).

1 with situations in which a defendant's testimony in her own defense involves details regarding the
2 abusive behavior of a co-defendant, circuit and district courts alike have held severance necessary to
3 safeguard the defendant's rights to testify and to present a defense.

4 *United States v. Blunt*, 930 F.3d 119 (3d Cir. 2019), is illustrative. There, the government jointly
5 tried a husband and wife as co-conspirators, despite the fact that the wife's "state of mind" defense
6 involved her testifying that her husband was abusive and coerced her into participating in the charged
7 crime. *Id.* at 122. On review, the Third Circuit overturned both defendants' convictions, concluding
8 that each was entitled to severance. With respect to the wife, the Court held that the district court, by
9 "curtail[ing]" the wife's "probative" testimony about her state of mind "in an attempt to prevent the jury
10 from hearing prejudicial statements against" her co-defendant husband, had "prevented" the wife "from
11 exercising fully her right to testify in her own defense." *Id.* at 123, 128. Similarly, the court granted
12 severance in *United States v. Carona*, No. CR 06-224, 2008 WL 1970221 (C.D. Cal. May 2, 2008), on
13 the ground that a joint trial would have limited the defendant's ability "to give exculpatory testimony in
14 her own defense" by allowing her co-defendant husband to invoke the marital communications
15 privilege. *Id.* at *3-4; *see also United States v. Blanchard*, No. 05-80355, 2007 WL 1976359, at *7
16 (E.D. Mich. July 3, 2007) (granting severance on similar facts to avoid "[f]orcing a defendant into a
17 'Catch-22'" between asserting the spousal privilege and her right to testify on her own behalf when "the
18 dilemma" could be "minimized by a severance pursuant to" Rule 14).

19 As the defendants in *Blunt* and *Carona*, Ms. Holmes would be entitled to offer probative
20 evidence regarding the abuse she suffered while in an intimate-partner relationship with her co-
21 defendant, Mr. Balwani—both in the form of her own testimony and other competent evidence. Any
22 effort to exclude or limit that evidence in order to shield Mr. Balwani from prejudice would necessarily
23 prevent Ms. Holmes from "from exercising fully" her rights to "provid[e] exculpatory testimony on her
24 own behalf." *Blunt*, 930 F.3d at 128; *see Carona*, 2008 WL 1970221, at *3. So too, the constitutionally
25 guaranteed opportunity to present a defense would "be an empty one if the State were permitted to
26 exclude competent, reliable evidence" that is "is central to the defendant's claim of innocence"—here,
27 evidence bearing on Ms. Holmes' state of mind. *Crane*, 476 U.S. at 690. For this independent reason, a
28

1 joint trial presents a serious risk of compromising Ms. Holmes' rights to testify on her behalf and to
 2 present a defense.

3 **II. There Is a Serious Risk that a Joint Trial Would Compromise the Jury's Ability Reliably**
 4 **To Judge Ms. Holmes' Guilt or Innocence**

5 Severance is also required for the independent reason that a joint trial would likely "prevent the
 6 jury from making a reliable judgment about" Ms. Holmes' "guilt or innocence." *Zafiro*, 506 U.S. at
 7 539.

8 The potential effects of Ms. Holmes' PTSD on her demeanor and behavior during the
 9 proceedings would threaten the jury's ability reliably to judge Ms. Holmes. As discussed, Ms. Holmes'
 10 physical proximity to Mr. Balwani poses a serious risk of triggering her PTSD and its attendant physical,
 11 psychological, and emotional effects. During the course of the proceedings, [REDACTED]

12 [REDACTED]. Mechanic
 13 Decl. at 14. [REDACTED]

14 [REDACTED]
 15 [REDACTED]. *Id.* at 14-15. *Cf.*

16 M.A. Dutton, *Validity of "Battered Woman Syndrome" in Criminal Cases Involving Battered Women*, in
 17 Dep't of Justice et al., *The Validity and Use of Evidence Concerning Battering and Its Effects in*
 18 *Criminal Trials* pt. I, at 12 (1996) (The "presence of a posttraumatic stress reaction may explain a
 19 battered woman's apparent lack of, or atypical, emotion when testifying or talking about her experience
 20 with violence. In some cases, the battered woman may report these events as though she has no feeling
 21 or emotion related to them, as if on 'automatic pilot.'").

22 When it comes to Ms. Holmes' ability to receive a fair adjudication, any PTSD-attributed
 23 changes in her demeanor would matter a great deal:

24 It is a fundamental assumption of the adversary system that the trier of fact observes the
 25 accused throughout the trial, while the accused is either on the stand or sitting at the defense
 26 table. . . . At all stages of the proceedings, the defendant's behavior, manner, facial
 27 expressions, and emotional responses, or their absence, combine to make an overall
 28 impression on the trier of fact, an impression that can have a powerful influence on the
 outcome of the trial.

1 *Riggins v. Nevada*, 504 U.S. 127, 142 (1992) (Kennedy, J., concurring); cf. 2 J. Wigmore, *Evidence*
 2 § 274 (J. Chadbourn rev. ed. 1979) (“[T]he attempt to force a jury to become mentally blind to the
 3 behavior of the accused sitting before them involves both an impossibility in practice and a fiction in
 4 theory.”). A joint trial with Mr. Balwani, and the PTSD-associated reactions it would be likely to
 5 produce, thus would present the significant risk that a jury would draw unfair and unreliable conclusions
 6 from Ms. Holmes’ demeanor; for instance, it might mistake Ms. Holmes’ PTSD-induced anxiety or
 7 nervousness as evidence of guilt, or her stillness in the presence of Mr. Balwani as emotional
 8 detachment or callousness. See, e.g., *Pliler*, 2008 WL 11411353, at *7-10 (stun belt prejudiced
 9 defendant by causing his “quiet, emotionless, and very subdued” “courtroom demeanor and behavior,”
 10 which was perceived by jurors as a sign that the defendant “had given up”). The chances that the effects
 11 of Ms. Holmes’ PTSD would mislead the jury would only increase should the PTSD “impact [Ms.
 12 Holmes’] demeanor on the stand” and, “in turn, . . . a jury’s perception” of her credibility as a witness.
 13 *Pliler*, 341 F.3d at 900-01 (internal quotation marks omitted); see O.G. Wellborn, *Demeanor*, 76 Cornell
 14 L. Rev. 1075, 1076-77 (1991) (noting widespread “assumption that demeanor provides highly useful
 15 information” when evaluating witness credibility at trial).

16 There is therefore a serious risk that Mr. Balwani’s presence would “adversely affect [Ms.
 17 Holmes’] demeanor in the presence of the jury,” and thus would prejudice the jury’s ability to assess
 18 reliably her guilt or innocence based on the evidence adduced at trial. *California v. Mar*, 52 P.3d 95, 97
 19 (Cal. 2002). Only severance can appropriately guard against that risk and protect Ms. Holmes’ right to a
 20 fair and reliable proceeding.

21 **III. No Other Relief Would Protect Ms. Holmes’ Rights**

22 For the reasons outlined above, a joint trial presents a serious risk of compromising Ms. Holmes’
 23 specific trial rights and the jury’s ability to assess reliably her guilt or innocence. To be sure, in many
 24 cases, steps short of severance—such as the administration of limiting instructions—“suffice to cure any
 25 risk of prejudice” that a joint trial may present to a defendant’s rights. *Zafiro*, 506 U.S. at 539. In this
 26 case, however, a significant risk of prejudice to Ms. Holmes arises not from evidence or arguments that
 27 would be adduced at a joint trial, but rather from the necessary presence of Mr. Balwani at a joint trial
 28 and the attendant physical, psychological, and emotional effects that presence is likely to have on Ms.

Holmes. Because no limiting instruction can account for Ms. Holmes' abusive history with Mr. Balwani or her resulting PTSD, severance is the proper remedy under *Zafiro*. See, e.g., *Blunt*, 930 F.3d at 125 n.1 ("probable effectiveness or lack of effectiveness of a limiting instruction" is relevant to evaluating whether a joint trial will prejudice a defendant (internal quotation marks omitted)); *Lopez*, 915 F. Supp. at 901 (granting severance when "less drastic measures, such as limiting instructions," would "not suffice to cure th[e] substantial risk of prejudice" presented by a joint trial).

Ms. Holmes does not seek severance lightly and acknowledges the administrative costs associated with severance. "[B]ut where the basic fairness of the trial is at issue," a defendant's rights "must trump the extra" "expense, time and trouble" of separate trials. *Swan*, 2013 WL 3422022, at *5; see also *Blanchard*, 2007 WL 1976359, at *6 ("[A] single joint trial, however desirable from the point of view of efficient and expeditious criminal adjudication, may not be had at the expense of a defendant's right to a fundamentally fair trial." (internal quotation marks omitted)). So too here: Because the proposed joint trial presents a serious risk of prejudice to Ms. Holmes, severance, even if inconvenient, is nonetheless necessary to safeguard her fundamental trial rights and entitlement to a fair and reliable adjudication.

CONCLUSION

For the foregoing reasons, the Court should sever Ms. Holmes' case from Mr. Balwani's for trial.

DATED: December 16, 2019

Respectfully submitted,

/s/ Kevin Downey
 KEVIN DOWNEY
 LANCE WADE
 AMY MASON SAHARIA
 KATHERINE TREFZ
 Attorneys for Elizabeth Holmes

CERTIFICATE OF SERVICE

Pursuant to 18 U.S.C. § 1746, I hereby certify that copies of this Motion for Severance and its supporting documents, along with the related Administrative Motion For Leave to File Documents Under Seal, were served via email to the attorneys at the following addresses on the same day it was filed with the Court under Local Civil Rule 7-11.

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DECLARATION OF MINDY B. MECHANIC, Ph.D. IN SUPPORT OF SEVERANCE
05 December 2019

I, Dr. Mindy B. Mechanic, hereby declare the following:

- I. **INTRODUCTION:** I am over the age of eighteen and am competent to testify. The facts enumerated in this Declaration are true and are based on my own personal knowledge or on information provided to me, and I believe them to be true.
- II. **QUALIFICATIONS:** I am a clinical/forensic psychologist, specializing in trauma/victimization, with a focus on interpersonal violence, i.e., intimate partner abuse (IPA), sexual trauma, and stalking. My work on these topics has spanned nearly three decades, and is comprised of research, teaching, professional training, as well as the provision of direct services to victims/survivors of trauma. By "direct services," I am referring to conducting clinical and forensic assessment, providing empirically supported therapy to trauma survivors and conducting supervision of graduate students (master's and doctoral level) to conduct trauma research, trauma-based therapy, and assessment. I have also provided more informal supervision on forensic evaluation in trauma cases to experienced colleagues branching out from research and clinical work to provide trauma-based forensic evaluations. A current copy of my CV is attached as *EXHIBIT A*.
 - a. **EMPLOYMENT:**
 - i. As of 11/01/19, I am presently retired from my position, Professor of Psychology at California State University-Fullerton (CSUF), where I was a tenured professor since August 2002. While at CSUF, I regularly taught upper division undergraduate courses on abnormal psychology and personality theory, as well as graduate level courses on the following topics: a) legal, ethical, and professional issues in clinical psychology; b) psychological assessment; and c) a seminar on trauma, violence, and victimization. Additional duties included conducting independent research and providing research supervision to graduate and undergraduate students working on research and thesis projects. In 2013, I was awarded a grant for just under one million dollars from the National Institute of Justice (the research arm of the Department of Justice) to study the impact of culture and ethnicity on women's experiences of intimate partner abuse. I have provided numerous (about 100) professional trainings on intimate partner/sexual violence to varied audiences including attorneys (military and civilian), family court personnel, mental health providers, and medical staff. I have about 25 peer-reviewed publications and about 100 peer-reviewed conference presentations. I have also served as a peer reviewer for journals, conferences, and grants.

- ii. Prior to joining the faculty of CSUF, I was employed at the Center for Trauma Recovery at the University of Missouri-St. Louis (the Center) for ten years, initially as a Research Associate (1992-1996) and Post-Doctoral Fellow(1996-1998) and then as an Assistant Research Professor (1998-2002). The Center is a specialized center focused on conducting research, teaching and training and providing specialized clinical services to traumatized and victimized individuals. Victims of intimate partner abuse and sexual assault survivors were the most frequently treated populations at the Center's clinic. As part of my duties at the Center, I conducted research on sexual assault and intimate partner abuse, for which I wrote or co-wrote federal grants. I also provided direct clinical services to sexually assaulted and victimized or traumatized individuals and supervised Ph.D. students in trauma research, assessment and treatment. During my ten years at the Center, I taught courses on the psychological consequences of violence and victimization and conducted numerous professional trainings for varied groups including, local mental health professionals, the Missouri Bar Association and the American College of Legal Medicine.

b. CLINICAL/FORENSIC PRACTICE: I received my first license to practice psychology in 1998, in the state of Missouri, and my second in 2000 in the state of Illinois. I kept both licenses current until receiving licensure in California in 2004. I have been continuously licensed in California (#19660) since that time. I have worked directly with victims of crime and survivors of trauma in various contexts, including clinical and diagnostic interviews for research; clinical assessments for treatment, clinical assessments for forensic purposes, and provision of psychotherapy. I've had face to face contact with 100's if not 1000's of survivors of trauma at this point in my career.

- i. I have worked independently as a forensic psychologist since obtaining my first license to practice psychology in 1998. I regularly conduct forensic evaluations in criminal (civilian and military), civil, juvenile, and family law cases involving trauma and victimization, with about 85-90% of my cases focusing on intimate partner abuse and sexual assault. Some of these evaluations result in my service as an expert witness to the court, however, most of the cases result in plea agreements or settlements. I have specialized forensic expertise and experience in cases involving victims of intimate partner abuse, usually (but not always) women who were charged with crimes committed in the context of their abuse.
- ii. Apart from my role as forensic evaluator, I also regularly provide general educational testimony to military and civilian criminal courts in cases involving the prosecution of intimate partner, sexual assault, and stalking cases, and I serve as an expert consultant to attorneys litigating these cases.
- iii. Over the course of time, I have been retained approximately equally for the defense and prosecution. I have also been retained and have testified in

criminal cases, involving men charged with crimes involving sexual assault and intimate partner abuse.

- iv. To date, I have been qualified to testify in criminal courts (military and civilian), juvenile courts, family courts, and civil courts. I've also testified in some administrative hearings and in many evidentiary hearings in criminal courts. In total, I have testified on somewhere between 70-80 occasions. I have never failed to qualify as an expert in a case in which I was called as an expert witness.

III. **CONTEXT OF REFERRAL:** On June 13, 2019, I was contacted via email, by Ms. Amy Saharia and Ms. Katherine Trefz, attorneys at Williams & Connolly, LLC about the possibility of conducting an evaluation of their client, Ms. Elizabeth Holmes ("Ms. EH"). After a conference call on June 17, 2019, I was formally retained on June 20, 2019. The referral question focused on evaluating whether Ms. EH was the victim of intimate partner abuse at the hands of her intimate and business partner, Mr. Ramesh "Sunny" Balwani ("Mr. SB"), and if so, what was the nature and extent of such abuse, and in what ways did that abuse affect her functioning during the course of their relationship, and continue to affect her functioning after its dissolution, and in present time.

I am being compensated at my regular hourly rate of \$350/hour, in addition to reimbursement for any professional expenses incurred related to my work on this case.

This declaration is provided for the limited purpose of supporting Ms. Holmes's Motion for Severance. It does not capture all of my opinions regarding intimate partner abuse, the abuse suffered by Ms. EH, how rape and intimate partner abuse affect their victims, or other research or analysis that may be relevant to this matter.

IV. **METHODOLOGY OF EVALUATION:** Ms. EH was evaluated face to face on 8/27/19 and 8/28/19 for a total of approximately 14 face-to-face hours at the office of Williams & Connolly, LLP in Washington, DC. Evaluation methods included a semi-structured interview, structured interviews, and psychological testing. Relevant, available court and legal documents and other materials were also reviewed. Collateral interviews were conducted with Ms. EH's parents, Noel Holmes ("NH") and Christopher (Chris) Holmes ("CH"). These interviews were conducted on 8/29/30 in at the law offices of Williams & Connolly. NH and CH were interviewed individually, with each interview lasting between 1-2 hours. Ms. EH's brother, Christian Holmes, was interviewed in San Francisco on 11/4/19 for approximately 90 minutes.

A list of documents reviewed is provided in *EXHIBIT B*.

- a. **FORENSIC EVALUATIONS:** Forensic evaluations differ from all other forms of clinical practice, including clinical assessment, in that forensic evaluations are NOT conducted to advocate for the evaluatee, help them with their problems, assist

them in accessing resources or services or to view their statements uncritically through the lens of support or advocacy (Greenberg & Shuman, 1997; 2007). Instead, the purpose of a forensic evaluation is to provide an objective legally relevant opinion based on critical analysis of multiple sources of data, to include documentary evidence, evaluatee interview data, psychological test data, and reports from collateral sources who have relevant observational, first-hand knowledge of the evaluatee's functioning, history, etc. Forensic evaluations proceed like social science experiments in which pertinent data is collected and is then considered as to whether that data supports or refutes various theories or hypotheses about the evaluatee's history and functioning. For example, in the case of allegations of intimate partner abuse, it is important to evaluate evidence (from multiple sources) that might support a history of intimate partner abuse, as well as refute it. Such an approach reduces the risk of confirmation bias (i.e., a cognitive bias in which individuals search for data that supports their theory/hypotheses, while failing to consider, or otherwise ignoring data that refutes or fails to support that theory) or other forms of bias based on the desire to help or otherwise advocate for the evaluatee (Heilbrun & LaDuke; Melton et al., 2017; Wygant & Lareau, 2015). Finally, forensic assessment protocols include assessment of an individual's response to the tests in order to measure response bias, such as over-reporting, under-reporting, or malingering of symptoms in an effort to appear worse off or better off than a person is (Bush, Heilbrunner, & Ruff, 2014; Rogers, Sewell, & Salekin, 1994). Assessment of response validity that are routinely included in forensic evaluations are often unnecessary to assess in general clinical contexts when the goal is simply to assess a client for purposes of psychological treatment.

- b. Forensic evaluations involving women with histories of intimate partner abuse charged with crimes are unique compared to most other forensic evaluations because in addition to the usual assessment of mental health conditions affecting functioning, it is also necessary to evaluate the nature and extent of abuse exposure, the variety of ways in which an abused individual responds to various dimensions of abuse, and the multiplicity of ways in which abuse can impact psychological, emotional, physical, health and occupational functioning (Dutton, 1993; 1998; 1996; Ferraro, 2002; Osthoff, & Maguigan, 2005) above and beyond mental health conditions. Thus, such evaluations require supplemental tools and contours that are not required in a standard mental health-focused forensic evaluation.

EXHIBIT C contains a list of cited references for the scholarly material cited below.

- V. **RESEARCH ON THE DYNAMICS OF IPA:** The conundrum of IPA is that love and loyalty coexist with an array of abusive tactics that are deployed in the service of achieving control over an intimate partner. While most people, even trained professionals, conceptualize intimate partner abuse as consisting primarily or exclusively of physical violence and resultant injuries, physical violence occurs significantly less often in abusive partnerships compared to other forms of abuse, notably emotional/psychological abuse (Sullivan, McPartland, Armeli, Jaquier, & Tennen, 2012). Research documents that in the context of abusive relationships,

women experience an array of topographically distinct forms of abuse, i.e., physical violence, emotional/psychological abuse, sexual violence/coercion and stalking/harassment (Logan, Walker & Cole, 2015; Mechanic, Weaver, & Resick, 2008; Ullman, 2007). Each of these four dimensions of abuse are NOT present in all abusive relationships, nor do they remain static over the course of time. Instead, the nature, type, and frequency of abusive tactics shift or evolve over time, in response to a variety of factors, including how the victim responds to her partner's abusive tactics, and in turn how the offender responds to the victim's responses in a transactional fashion. For example, if a victim challenges her partner's control, attempts to fight him back or otherwise assert her autonomy, and she's met with rage, a verbal barrage, or other forms of abuse, the lesson is clear – resistance or challenge is met with an escalation of abuse. Hence, his reactions shape her behavior such that she no longer deploys those forms of responses because they resulted in increased risk of harm rather than cessation or de-escalation of abuse or violence.

Because physical violence is not always present, a relationship can be quite abusive, yet consist of relatively little physical violence and/or injuries.

The following are the specific types of abusive tactics that have been enumerated in the literature on intimate partner abuse:

- a. **Physical Violence** can range from minor acts of aggression such as pushing, shoving, or slapping, all the way to injurious, or even potentially lethal acts of violence including strangulation or being beaten with multiple blows and may or may not result in visible injuries, based on the nature, type and severity of the violence.
- b. **Emotional/Psychological Abuse** can include a range of acts that undermine a victim's sense of worth, value, agency, and freedom. Common examples include degradation; name-calling, humiliation; jealous accusations; denial/minimization of the abuse; blaming the victim for the abuse meted out to him/her; control over access to resources; isolation from friends, family or anyone that might assist the victim in exiting the abusive relationship; gaslighting.
- c. **Sexual Coercion/Aggression** can include the use of pressure, threats, force, or other manipulative tactics in an effort to manipulate a partner into engaging in sexual activities that are unwanted. It can also include other aspects of sexual coercion, like insisting a woman watch porn, dress provocatively, or engage in other unusual sexual practices for which she has signaled her lack of interest. Withholding sex or affection from a partner unless a victim capitulates to his demands is considered a form of emotional abuse transacted in a sexual context.
- d. **Stalking/Harassment** includes various form of surveillance and other unwanted intrusive conduct, whether taking place during the course of an ongoing abusive relationship, or in the post-separation phase of a former abusive relationship. Stalking and harassment are control tactics that are designed demonstrate to the victim that her abusive partner will always maintain control over her, and she will

never be free, even once separated or divorced. Unwanted calls, email/mail, visits, gifts, are common. In the virtual era, new forms of virtual stalking include installing GPS tracking devices and spyware on a victim's computer or smart phone. Harassment of friends, family and new partners are included in this category.

- e. **Emotional/Psychological Abuse Occurs Most Frequently.** Despite the typical focus on physical violence and injuries, research finds that even in abusive relationships, the majority of days in a relationship tend to be abuse and violence free. Sullivan et al., (2012) conducted a micro-analysis of the daily occurrence of physical, psychological and sexual IPV over a 90-day study period. One notable finding was that on the majority of days (62%) no IPA was reported. Psychological IPA was most commonly reported (37% of days), followed by physical (9% of days) and sexual IPA (4% of days). Sexual and physical IPA tended to occur on days with co-occurring psychological IPV, whereas psychological IPA was more apt to exist as a stand-alone form of abuse. These data underscore the notion that even in abusive relationships, most periods of time are violence-free, and that physical violence is the anomaly, not the norm. Periods of time without abuse are reinforcing and foster hope that it is possible for the relationship to be transformed into a healthy, violence and abuse-free partnership.

- VI. **INTIMATE PARTNER SEXUAL ASSAULT (IPSA) IS UNIQUE.** The dynamics of IPSA are unique compared to other forms of sexual assault. While IPSA is shockingly common, it is the least talked about form of sexual assault, the least frequently labeled as sexual assault, and the least frequently reported to law enforcement (Logan, Walker, & Cole, 2015). Only about 50% of sexually victimized women label their experience of forced sex as a sexual assault, and that rate drops significantly when the perpetrator is an intimate partner (Kahn, Jackson, Kully, Badger, & Halvorsen, 2003; Littleton, Radecki, Breithopf, Berenson, 2008). Moreover, women's own endorsement of rape myths and scripts, such as stranger danger hinder their ability to accurately identify and label incidents of sexual assault as such (Peterson & Muehlenhard, 2004). Because of the shame and stigma associated with IPSA, many women tell no one. In fact, Logan & Cole (2011) found that 85% of women in their study who experienced IPSA, told NO ONE about it, including friends or family. Women who experience IPSA report intense feelings of shame and humiliation, and confusion about the difference between forced or coerced sex and their 'wifely duties' (Logan, Cole, & Shannon, 2007; Logan, Walker, & Cole, 2015).

When incidents of IPSA are not labeled as such, there is not possibility of a formal report to law enforcement. Labelling an act of nonconsensual sex as crime is a prerequisite for reporting it as a crime to law enforcement. Of the various configurations of victim-offender relationships sexual assaults committed by intimate partners are among the least frequently reported to law enforcement.

- VII. **STEREOTYPES OF ABUSED WOMEN:** Research documents that laypersons and professionals alike are unfamiliar with the nature and dynamics of IPA, adhering to numerous stereotypes and misperceptions about abused women (Peters, 2008; Nayak, Byrne, Martin, &

Abraham, 2003; Westbrook, 2009). Stereotypes include the notion that only poor, uneducated, ethnic minority women who lack educational and/or financial resources are victims of IPA. In contrast, IPA crosses gender, ethnic, racial, sexual orientation, and socioeconomic boundaries. Individuals who accept myths about IPA are more likely to blame the victim, holding her rather than her abusive partner responsible for the victimization (Flood & Pease, 2009; Hockett, Saucier, Hoffman, Smith & Craig, 2009; Policastro & Payne, 2013). While women with education, financial resources, and sources of personal support might seem less vulnerable to abuse, they face unique obstacles, such as fears that no one will believe them, or the loss of a certain lifestyle to which they have become accustomed. Moreover, a woman can be trapped in an abusive relationship, yet still be able to function successfully in other domains, such as in occupational or educational roles. In fact, for some women, excelling in their professional careers becomes a way of coping with the abuse by compartmentalizing it instead of dealing with it directly, and focusing their effort and energies on their professional or educational pursuits.

- VIII. **ABUSED WOMENS' AGENCY:** Victim behavior that might superficially appear as passive, may actually reflect agentic decisions to capitulate to her abuser in order to increase survival and reduce myriad potential risks of continued or escalated abuse or violence. Actions that might seem passive, instead can reflect volitional decisions to defer, appease, relent, and capitulate to stated and unstated demands in order to (emotionally and/or physically) survive relationships when extrication from the relationship appears unsafe or inviable to them, for whatever reason (Dutton, 1993; Dutton & Goodman, 2005). While in many instances survival means physical survival, in cases in which emotional dependency and capitulation to the abuser have eroded autonomous expression of self, survival is experienced more as emotional survival, and a victim may come to believe that she is unable to function without her partner. This process results directly and indirectly through words communicated by the abuser to the victim, about her lack of self-worth, her incompetence, or her inability of function without him, which ultimately are internalized as negative core beliefs about self-worth, self-efficacy, and ability to function or survive without the abuser.
- IX. **COERCIVE CONTROL:** While the seemingly disparate forms of abuse (i.e., physical violence, sexual abuse, emotional/psychological abuse, stalking/harassment) may appear distinct, the tie that binds them is coercive control. By causing harm, threatening to cause harm (to the woman herself, her family, her property/pets, or self-harm), instilling fear, or otherwise making it known that negative, unwanted consequences attach for resistance or non-compliance with demands and expectations, an abuser can effectively control his abused partner (Crossman & Hardesty, 2017; Stark, 2007). A recent review of coercive control by Hamberger, Larsen, & Lehrner (2017) identified three essential elements of coercive control: 1) intentional or goal orientation in the abuser; 2) negative perception of the controlling behavior by the victim, and 3) the ability of the abuser to maintain control through the use of a threat to which the victim will likely capitulate. Control exists on a continuum (Johnson, 2008), and is effectuated by creating a climate of fear (Crossman & Hardesty, 2017).

Given its goal to influence and restrict choice, coercive control is essentially a form of oppression that restricts an individual's agency and autonomy because capitulation with the

demands and expectations of an abuser is emotionally and/or physically safer than challenging those demands or expectations which often results in violence escalation.

Thus, IPA is fundamentally about control, not physical violence, which is only one of its many tactics (Dutton & Goodman, 2005; Follingstad & Rogers, 2014; Logan, Cole, & Shannon, 2007; Mechanic, Weaver, & Resick, 2008; Stark, 2009; Stansfield & Williams, 2018). Physical violence therefore does not need to be present for a relationship to be characterized as coercively controlling (Crossman, Hardesty, & Rafaelli, 2016).

Coercively controlling behaviors can include financial control; intimidation; isolating the woman from her social support network; controlling her access or resources; restricting her clothing options, makeup, jewelry, or style of dress; restricting her consumption of food or drink; adherence to traditional masculine-feminine gender roles; physical or sexual violence or other threats for failed compliance with her partner's wishes. Threats by an abuser may take on various complexions and include threats to harm the victim, her family, her pets, her property, or otherwise instill unwanted, social or emotional costs for failed compliance (Dichter, Thomas, Crits-Christoph, Ogden, & Rhodes, 2018; Mechanic, Weaver, & Resick, 2000; Stark, 2007). The essence of coercive control hinges on the costs and consequences for failed compliance, and the subsequent behavioral change it induces in the victim, who learns to comply in the situation or in advance, in order to avoid the abusive consequences of failed compliance they have learned, from experience, are on the horizon.

Once there has been a history of abuse in a relationship, an abuser can effectively control his partner through more nuanced and subtle forms of abuse, such as threats, intimidation, degradation, or instillation of fear, even without any additional acts of overt violence because his victim already knows that he is capable of, and willing to resort to violence against her to achieve his aims (Dutton & Goodman, 2005; Follingstad & Rogers, 2014). At that point, even simple, subtle acts, such as a look or glance can signal impending harm, effectively keeping a woman controlled without anyone in the immediate social environment becoming aware of the controlling dance taking place before them. Fischer, Vidmar, & Ellis (1993) refers to these nuanced forms of effectively controlling communication in abusive relationships as a "culture of battering," and further go on to argue that because of tacit, unobservable (to outsiders) signs of control, divorce/custody mediation inherently disadvantages abused women who can be successfully manipulated to capitulate, even in the presence of a trained divorce/custody mediator.

Coercive control also continues post-relationship termination (Ornstein & Rickne, 2013), as the abuser's motive is to maintain control over his partner, often even after she has successfully exited the relationship. As described above, the goal of coercive control is instilling fear, such that the victim complies with or capitulates to her abuser, in order to avoid unwanted, painful, negative or otherwise abusive consequences, thus resulting in loss of autonomy and agency.

- X. **DECISIONS TO STAY/LEAVE:** The ubiquitous question posed of abused women is often, "WHY DIDN'T SHE JUST LEAVE," when the question is really, "why does he keep abusing her, even after she has?" (Mahoney, 1991). There are many reasons why abused women stay, including but not limited to: emotional ties, relationship investment, love, fear, loyalty,

emotional dependency, including concerns that she won't be able to make it without him, and more (Anderson & Saunders, 2003; Barnett, 2000; Dutton, 1993). While many of these beliefs, referred to as cognitive distortions, might not appear realistic to outsiders, because of the way in which abuse erodes one sense of self, self-worth, and competence, a victim can become convinced that her survival is predicated on remaining with her seemingly more capable partner.

When victims of IPA perceive leaving their abusive partner as not safe or viable (even if based on distorted perceptions or beliefs), they also must deny, distort or minimize the abuse perpetrated against them, because to do otherwise would create unmanageable levels of cognitive dissonance (Nicholson & Lutz, 2017). One cannot simultaneously acknowledge being the victim of IPA and at the same time make disclosures about said abuse UNLESS and UNTIL that victim is ready and able to leave the relationship. For example, it would be impossible to report your spouse to the police for sexual assault or even to disclose this abuse to friends or family, while continuing to stay partnered with him. This means that not infrequently, victims are only able to acknowledge or label nonconsensual sexual experiences as sexual abuse/assault within an intimate relationship once they've left the abusive partner.

To the extent that a victim of IPA engages in denial, minimization, or distortion as a survival-based coping mechanism, she may also fail to accurately perceive the risks of harm to herself (Matlow & DePrince, 2012). Accordingly, sometimes it takes a sufficiently violent or otherwise noteworthy incident of violence or abuse for a victim to recognize, label it as such, and take appropriate protective action, such as leaving the abuser, or making a report to law enforcement. Living with abuse and trauma results in an array of distorted cognitions and perceptions about oneself and the abuser that affect judgement and decision-making.

XI. **LEAVING IS A PROCESS, not an EVENT:** Abused women's decisions to leave abusive partnerships are complex and multifaceted (Rhatigan, Street & Axsom, 2006). Most victims of IPA eventually leave abusive partnerships, although they may leave and return many times before ultimately extricating themselves from the relationship permanently. Thus, leaving is a process, rather than a single event (Anderson & Saunders, 2003; Koepsell & Kernic, & Holt, 2006). Various factors have predicted decisions to leave abusive partners in research, including previous attempts to leave the relationship, escalation of abuse, decreased investment in the relationship, perceived support, physical violence, emotional/psychological abuse, concern for the welfare of children or other valued interests, as well as women's vulnerability. Once a woman has decided to depart from an abusive relationship, she may no longer be willing to protect him or his interests, and at that point, she may be more willing to disclose the abuse to friends, family, law enforcement or other helping professionals.

XII. **REPORTING TO LAW ENFORCEMENT:** Most episodes of IPA are not reported to the police. Data from the National Violence Against Women Survey (NVAWS) indicate that approximately 20% of all rapes, 25% of all physical assaults, and 50% of all stalking incidents perpetrated against female respondents by intimates were reported to the police (Tjaden & Thoennes, 2000). There are many barriers to reporting, including that once a woman reports IPA to the police, she must be prepared to leave the relationship. Unless and until a woman is prepared to leave, reporting is often not perceived to be a safe and viable option.

- XIII. VULNERABILITY TO INTIMATE PARTNER AND SEXUAL VIOLENCE:** Survivors of childhood and/or adolescent sexual assault are significantly more likely to be sexually revictimized in adulthood (Black et al., 2011; Casey, & Nurius, 2005; Classen, Palesh, & Aggarwal, 2005; Cloitre, 2006). Moreover, Kilpatrick et al (1987) document that once an individual has experienced a single high magnitude trauma, such as a sexual assault, they are at increased risk of experiencing subsequent traumatic events over the course of their lifetime.

Research also documents that not only does childhood or adolescent sexual assault increase the odds of subsequent adult sexual revictimization, but also that prior sexual trauma incrementally adds to the risk of developing PTSD, such that sexually revictimized women are significantly more likely to be diagnosed with PTSD following revictimization, compared to singly sexually victimized women (Nishith, Mechanic, & Resick, 2000; Walsh et al., 2012). In a large nationally representative sample of adolescents Ellwood et al., (2001) found that both prior sexual assault and PTSD were predictors of subsequent sexual assault. Finally, sexual trauma in adolescence/young adulthood had been identified as a predictor of becoming involved in an abusive romantic partnership (Halpern, Spriggs, Martin, & Kupper, 2009).

- XIV. MENTAL HEALTH CONSEQUENCES OF IPA:** The mental health consequences of intimate partner abuse have been well-documented, with posttraumatic stress disorder (PTSD), depression (including suicidality) and anxiety, the most commonly identified mental health outcomes of IPA (Afifi et al., 2008; Coker, Weston, Creson, Justice & Blakeney, 2005; Gleason, 1993; Golding, 1999; Mechanic et al., 2008; Taft, Resick, Watkins, & Panuzio, 2009; Wilson, West, Messing, Brown, Patchell, & Campbell, 2011). PTSD is a diagnosable psychiatric condition listed in the Diagnostic and Statistical Manual (DSM-V). In order to receive a PTSD diagnosis, an individual is required to meet multiple criteria comprised of a specified number of clinical symptoms of PTSD, alongside documented clinical distress and/or functional impairment in one or more areas (American Psychiatric Association, 2013). Moreover, unlike other psychiatric diagnoses, such as major depressive disorder or panic disorder, PTSD is unique in that it requires exposure to a traumatic event that results in an array of clinical and functional impairment symptoms. The DSM-V articulates specific criteria as to what constitutes a 'trauma,' for purposes of a PTSD diagnosis. Specifically, the definition of a traumatic event requires "exposure to actual or threatened death, serious injury, or sexual violence," that may be experienced directly, witnessed, or learning of a trauma experienced by a loved one. IPA is considered a traumatic event qualifying for a PTSD diagnosis, as long as other symptom and impairment/distress criteria are met.

Rates of PTSD in battered women range from 31% to 84%, with a weighted mean prevalence estimate of 64% (Golding, 1999). These rates are considerably higher than the rates of PTSD found among general community samples of women, which range from 1% to 12%, and are also considerably higher than the PTSD rates found among community samples of women with histories of non-IPA forms of criminal victimization (Golding, 1999). Moreover, non-physical forms of IPA, such as psychological abuse also contribute to PTSD symptoms, above and beyond the contributions of physical violence (Basile, Arias, Desai & Thompson, 2004; Jones et al., 2001; Mechanic, Weaver, & Resick, 2008). Finally, subjective perceptions of fear, rather than objective indicators of actual violence predicts PTSD symptoms among IPA exposed

women (Jaquier & Sullivan, 2014; Wilson et al., 2011), with a linear relationship observed such that increased levels of fear are associated with increased symptoms of PTSD. Specifically, the greater a woman's perceptions that her partner would be likely to harm her, the higher her levels of PTSD symptoms (Wilson et al., 2011). These findings applied not only to current abusive relationships (Wilson et al., 2011), but also to fear of past abusive partners committing harm against the survivor (Jaquier & Sullivan, 2014).

The weighted mean prevalence of major depression among battered women is estimated to be 48% (Golding, 1999), a rate also considerably higher than those obtained in epidemiological samples of women. A more recent meta-analysis (Beydoun et al., 2012) found a two to three-fold increase in diagnoses of major depressive disorder associated with IPA. Like with PTSD, major depressive disorder a diagnosable clinical condition with specified criteria that must be met in order to receive a diagnosis. Fleeting feelings of sadness that are normatively experienced by most individuals that do not reach clinically specified thresholds for symptom severity, distress and impairment are not diagnosable conditions. Other mental health consequences of IPA include anxiety, somatic and physical health complaints (Afifi et al., 2008; Bonomi, Anderson, Rivara, Thompson, 2007; Campbell, 2002; Carbone-Lopez, Kruttschnitt, & MacMillan, 2006).

- XV. **FEAR:** Fear is commonly reported among abused women (Sackett & Saunders, 1999) – this includes both fear-based on prior acts of abuse in the partnership, as well as fear of the unknown, i.e., what an abusive partner might do, based on his threats or other perceptions of harm. Thus, fear, in the context of IPA, results from both the perceived risk of violence and the uncontrollability of that risk (Jaquier & Sullivan, 2014). Abused women's fear has manifold sources, including fear of physical harm or injury, or fear of other consequences based on the unique contextual factors of that relationship (Jaquier & Sullivan, 2014). Feeling unsafe, as well as other perceived risks of potential harm are predictors of PTSD among abused women (West et al., 2011).

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² Research on adolescence documents that the brain is not fully formed until approximately age 25, thus the period of time from late adolescence until age 25 is one rife with substantial cognitive, emotional, interpersonal development that solidify the developmental tasks of adolescence launching into young adulthood. Even though young adults (18-25) are classified as 'adults' for many purposes, they have not yet attained the developmental maturity of adults.

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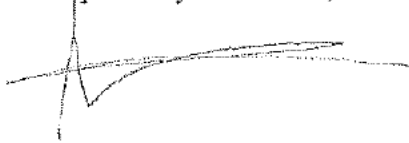
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Please do not hesitate to contact me if you have additional questions or concerns.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Mindy B. Mechanic', with a long horizontal flourish extending to the right.

Mindy B. Mechanic, Ph.D.
Licensed Psychology (#19960-CA).

MECHANIC DECLARATION: EXHIBIT A

NOVEMBER, 2019

Curriculum Vitae

Mindy B. Mechanic

President, Forensic Psychological Consulting, Inc.

Cell: 5623-230-4312

Email: mindymechanic@icloud.com; mindymechanic@gmail.com

Education

Ph.D.

University of Illinois at Urbana-Champaign, 1996

Major: Clinical Psychology; Minor: Law

Dissertation: Battered Woman Syndrome: Juror Common Understanding and Expert Testimony

Clinical Internship, **University of Virginia Health Sciences Center, 1990-1991**
(APA-Accredited Pre-doctoral Internship)

Rotations: Adult Psychiatric Clinic (major),
Western State Hospital, Acute Admissions Unit (major),
Forensic Psychiatry Clinic (extended minor)
Family Stress Clinic (minor)
Pain Management Center (minor)

M.A.

University of Illinois at Urbana-Champaign, 1987

Major: Clinical Psychology

Thesis: Assessment and Differentiation of Chronic Depression in a Non-Patient Sample

B.A.

University of California, Los Angeles (Psychology), 1981

Professional Licenses

March, 2019	Interjurisdictional Practice Certificate (IPC # 4712)
May, 2004	Licensed Psychologist, California (PSY 19660)
June, 1998	Licensed Psychologist, State of Missouri (PY 01885 -inactive)
July, 2000	Licensed Clinical Psychologist, State of Illinois (071-006086 -inactive)

Certificates and Specialized Training:

December, 2018	Basic FETI (Forensic Experiential Trauma Interview) Certification
August, 2017	APSAC Child Forensic Interviewing Certification
July, 2015	Certificate in Disaster Mental Health Fundamentals, American Red Cross
August, 2015	APA Training in Disasters and the Media

Forensic Expertise:

Interpersonal victimization (sexual assault, child maltreatment/adversity, intimate partner abuse, stalking, domestic homicide, infanticide, trauma and alcohol-related memory impairment);

impact of non-crime trauma (e.g., combat, accidents, disaster) on potentially criminal or harm-inducing behaviors towards others; risk assessment; workplace violence. Experienced working in criminal (military and civilian), civil, family, and juvenile courts.

Positions Held

6/2010- Current on	<u>President, Forensic Psychological Consulting, Inc.</u> Provides forensic evaluation, expert testimony, expert consultation and training trauma-related forensic psychology.
6/2013- 10/2019	<u>Professor of Psychology (RETIRED)</u> California State University, Fullerton Department of Psychology
8/2008- 7/2009	<u>Visiting Scholar</u> Whittier Law School
8/2006- 8/2013	<u>Associate Professor of Psychology</u> California State University, Fullerton Department of Psychology
2002- 7/2006	<u>Assistant Professor of Psychology</u> California State University, Fullerton Department of Psychology
1998- 2002	<u>Assistant Research Professor</u> Center for Trauma Recovery/Department of Psychology University of Missouri-St. Louis
1996- 1998	<u>Post-doctoral Fellow</u> Center for Trauma Recovery/Department of Psychology University of Missouri-St. Louis Supervised Post-Doctoral Clinical Training Program. Includes individual and couples therapy, clinical and forensic assessment with trauma and non-trauma populations. Conducted clinical assessments for the determination of disability.
October, 1992- July, 1996	<u>Project Director, NIMH Grant PTSD: Etiology and Treatment</u> Patricia A. Resick, Principal Investigator Department of Psychology University of Missouri-St. Louis Trained and supervised graduate student interviewers conducting structured diagnostic interviews for DSM-IV disorder. Responsible for participant recruitment from community agencies and all aspects of data collection.
July, 1991- September, 1992	<u>Research Assistant: Coercion Project,</u> The John D. and Catherine T. MacArthur Foundation Research Network on Mental Health and the Law.

Supervisors: S. K Hoge, M.D. and John Monahan, Ph.D.

Responsibilities: Participated in the design and implementation of research protocols. Assisted in the collection and analysis of statistical data. Cultivated and maintained relationships among the primary and satellite research sites.

Grants

Federal Grants

Principal Investigator, *Ethnocultural Influences on Women's Experiences of, and Responses to Intimate Partner Abuse*. (National Institute of Justice). \$925,100) Funded as of January, 2014.

Co-Investigator, *Translational Approaches to Understanding Sex-dependent Responses to Unpredictable Threat*. (National Institute of Health-NIMH), \$412,243.000 (under review).

Research Co-Leader, *Disparities in social support, isolation, and coping among cervical cancer survivors*. Joint pilot project proposed as part of the CSUF-UCI-CFCCC Partnership for Health Disparities Research (National Cancer Institute, funded, 2012), \$50,000.

Consultant, *Intimate Partner Violence in Mandatory Divorce Mediation: Longitudinal Outcomes from a Multi-Cultural Study* (2008), National Institute of Justice, \$226,031.

Principal Investigator, *Intimate Partner Abuse: Effects on Parenting*. Maternal and Child Health Bureau, HRSA (2003, not funded), \$1,199,159.

Principal Investigator, *Intimate Partner Abuse: Effects on Parenting*. Maternal and Child Health Bureau, HRSA (2002, approved for funding – not funded), \$750,000.

Co-Investigator. *Violence Against Women National Prevention Research Center*. Centers for Disease Control and Prevention (CDC, 1998), \$470,815.

Co-Principal Investigator, *Cognitive Processes in PTSD: Focus on Domestic Violence*. National Institute of Mental Health (NIMH, 1997), \$ 1,374,843.

Co-Principal Investigator, *Marital Violence in the Wake of the Great Flood of 1993*. National Institute of Mental Health (NIMH, 1993). NIMH Grant # 1 R03MH52513-01, \$71,266.

Internal and Foundation Grants

Principal Investigator, *Universal Screening for Intimate Partner Violence in Routine Clinical Care* (May, 2015), California Wellness Foundation, \$20,000.

Principal Investigator, *Battering, Parenting and Culture Among Latina Mothers*. (July, 2012) CSUF College of Humanities and Social Sciences, Summer Stipend.

Principal Investigator, *PTSD and Intimate Partner Violence among Hispanic and Non-Hispanic women* (2011, funded). California State University, Grant Incentive Fund, \$10,000.

Principal Investigator, *Adaptation to Intimate Partner Violence Among Ethnic Minority Women*, (2011, funded, release time, \$1500). CSUF Health Promotion Research Mini-Grant.

Principal Investigator, *Intimate Partner Violence Against Latinas: Exploring Ethnic Differences in Psychological and Strategic Outcomes* (2008). State Fullerton State Special Fund For Research, Scholarship And Creative Activity Grants, \$4,950.

Principal Investigator, *Intimate partner violence and PTSD among Latinas* (2006). California State Fullerton State Special Fund for Research, Scholarship And Creative Activity Grants, \$4950.

Principal Investigator, *Partner violence and parenting among Latinas* (2004-2005). California State Fullerton State Special Fund For Research, Scholarship And Creative Activity Grants, \$4855.

Principal Investigator, *Domestic violence and workplace issues* (2004). California State University, Faculty Development Center Intramural Grants (release time).

Principal Investigator, *Domestic violence and workplace issues* (2004). California State University, Department of Psychology, IRR release award.

Principal Investigator, *The impact of intimate partner abuse on battered women's parenting* (2003). California State University, Intramural grant, State of California (summer salary)

Principal Investigator, *The impact of intimate partner abuse on battered women's parenting* (2002). California State University, Faculty Development Center Intramural Grants (release time).

Principal Investigator, *The impact of intimate partner abuse on battered women's parenting* (2002). California State University, Department of Psychology, IRR release award.

Grant Consultation

Consultant/Local Research Partner, *St. Louis County Domestic Violence and Child Maltreatment Demonstration Initiative* (HHS/DOJ) (April, 2001, funded).

Consultant, *Community-based curriculum for training nursing students in the health care needs of incarcerated women*, Helene Fuld Health Trust (2000, funded).

Publications

Books

Mechanic, M.B. (in progress). *Explaining victim behavior: Using expert psychological evidence to prosecute sexual assault, stalking and intimate partner violence cases.*

Mechanic, M.B. (in progress). *Criminal Cases Involving Battered Women Defendants*

and Witnesses: Expert Evidence on Intimate Partner Battering and Its Effects. Oxford University Press.

Journal Articles

(under review)

Valdovinos, M., & Mechanic, M.B. (2019, under review). "Where mama duck goes, little ducklings follow": Exploring the Parenting Experiences of Latina Intimate Partner Violence Survivors.

Dardis, C.M., Ahrens, C., Howard, R.L., & Mechanic, M.B. 2019, (under review). Experiences of Stalking Among a Diverse Sample of Intimate Partner Abuse Survivors

(published)

Valdovinos, M. G., & Mechanic, M. B. (2017). Sexual coercion in marriage: Narrative accounts of abused Mexican-American women. *Journal of Ethnic & Cultural Diversity in Social Work*. 1-20, Published online: 09 May 2017

Segal, N.L., Cortez, F.A., Zettel-Watson., L.E., Mechanic, M.B., Munson, J.E., Velázquez, J.M.A., & Reed, B. (2015). Genetic and experiential influences on behavior: Twins reunited at 78 years. *Personality and Individual Differences*, 73, 110-117.

Pfaendler, K., Wenzel, L., Mechanic, M.B., & Penner, K.R. (2015). Cervical cancer survivorship: Long-term quality of life and social support. *Clinical Therapeutics*, 37, 39-48.

Shepherd-McMullen, C., Stokes, J., Mearns, J., & Mechanic, M.B. (2015) Negative Mood Regulation Expectancies Moderate the Relationship between Psychological Abuse and Avoidant Coping. *Journal of Interpersonal Violence*, 30, 1553-1556

Daftary-Kapur, T., O'Connor, M., & Mechanic, M.B. (2014). Gender intrusive questioning: A survey of expert witnesses. *Behavioral Sciences and the Law*, 32, 180-194.

Mechanic, M.B., & Pole, N. (2013). Methodological Considerations in Conducting Ethnoculturally Sensitive Research on Intimate Partner Abuse and its Multidimensional Consequences, *Sex Roles*. 69, 205–225

Beck, C.J.A., Walsh, M.E., Mechanic, M.B. & Taylor, C.S. (2010). Intimate partner violence screening and accommodations provided in mandatory divorce mediation. *Law and Human Behavior*, 34 (3), 227-241.

Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2008a). Mental health consequences of intimate partner abuse: A multidimensional assessment of four different forms of abuse. *Violence Against Women*, 14 (6), 634-654.

- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2008b). Risk factors for physical injury among help-seeking battered women: An examination of abuse dimensions. *Violence Against Women, 14* (10), 1148-1165.
- Marellich, W.D., Lundquist, J., Painter, K., & Mechanic, M. B (2008). Sexual Deception as a Social-Exchange Process: Development of a Behavior-Based Sexual Deception Scale. *The Journal of Sex Research, 45* (1), 27-35.
- Taft, C. T., Resick, P. A., Panuzio, J., Vogt, D. S., & Mechanic, M. B. (2007). Coping among Victims of Relationship Abuse: A Longitudinal Examination. *Violence and Victims, 408-418*.
- Taft, C. T., Vogt, D. S., Resick, P. A., & Mechanic, M. B. (2007). Posttraumatic stress disorder and physical health symptoms among help seeking battered women. *Journal of Family Psychology, 354-362*.
- Taft, C. T., Resick, P. A., Panuzio, J., Vogt, D. S., & Mechanic, M. B. (2007). Examining the correlates of engagement and disengagement coping among help seeking battered women. *Violence and Victims, 22* (1), 3-17.
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- Griffin, M.G., Uhlmansiek, M.H., Resick, P.A., & Mechanic, M.B. (2004). Assessment of posttraumatic stress disorder in domestic violence survivors: Comparison of an interviewer-based versus a self-report measure, *Journal of Traumatic Stress, 17* (6), 497-503.
- Mechanic, M.B. (2004). Beyond PTSD: Mental health consequences of violence against women: A response to Briere and Jordan. *Journal of Interpersonal Violence, 18*, 1-7.
- Weaver, T.L., Chard, K.M., Mechanic, M.B., & Etzel, J.C. (2004). Self-injurious behaviors, PTSD arousal, and general health Complaints within a treatment-seeking sample of sexually abused women. *Journal of Interpersonal Violence, 19* (5), 558-575.
- Griffin, M.G., Resick, P.A., Waldrop, A., & Mechanic, M.B. (2003). Reactions to participation in trauma research: Is there evidence of harm? *Journal of Traumatic Stress 16*, 221-227.
- Bennice, J.A., Resick, P.A., Mechanic, M.B., & Astin, M. (2003). The relative effects of intimate partner physical and sexual violence on posttraumatic stress disorder symptomatology. *Violence and Victims, 18* (1), 87-94.
- Lee, R.K., Sanders-Thompson, V.L., & Mechanic, M.B. (2002). Intimate partner violence and

- women of color: A call for innovation. *American Journal of Public Health*, 92 (4), 530-534.
- Rose, S., & Mechanic, M. (2002). Homophobic bias crimes: An examination of crime features, psychological distress and help-seeking behavior. *American Behavioral Scientist*, 46(1), 14-26.
- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2000). Intimate partner violence and stalking behavior: Exploration of patterns and correlates in a sample of acutely battered women. *Violence and Victims*, 15 (1), 55-72.
- Reprinted in: K.E. Davis, I.H. Frieze, & R.E. Maiuro (Eds.) *Stalking and obsessive behavior: Perspectives on victims and perpetrators*. Springer Publications (2002), pp. 62-88.
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- Nishith, P., Mechanic, M.B. & Resick, P.A. (2000). Prior interpersonal trauma: The contribution to current PTSD symptoms in female rape victims. *Journal of Abnormal Psychology*, 109 (1), 20-25.
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- Mechanic, M.B. & Aber, M.S. (1997). O.J. Simpson: A threat to internal validity? *Journal of Social Issues*, 53 (3), 517-530.
- Griffin, M.G., Resick, P.A., Mechanic, M.B., and Evans, T. (1997). Psychophysiological and nonverbal assessment of peritraumatic dissociation in rape victims. *American Journal of Psychiatry*, 154, 1081-1088.
- Abramson, P.R., & Mechanic, M.B. (1983). Sex and the media: Three decades of best-selling

novels and major motion pictures. *Archives of Sexual Behavior*, 12, 185-206.

Contributing Author

Moriarty, J.C. (1996). Psychological and scientific evidence in criminal trial. Thomson/West Publishers. [Contributed to Chapters 5 & 6, 2005/2006 Supplement].

Co-Editor

Mechanic, M.B. (2015). *Encyclopedia of Mental Health*. Oxford, England: Elsevier Press.

Chapters in Edited Volumes

Mechanic, M.B. (2011). Research on Intimate Partner Violence: Methodological and Ethical Considerations. In B. Rosenfeld and S. Penrod (Eds.) *Research Methods in Forensic Psychology*. New York: John Wiley Press (Chapter 26).

Davis, K.E., & Mechanic, M.B. (2009). Stalking victimization: The management of consequences. In C. Mitchell (Ed.) *Intimate Partner Violence: A Health-Based Perspective*. NY: Oxford University Press (Chapter 31).

Lyon, T., & Mechanic, M.B. (2006). Battered women and parenting. In N. Dowd, D.G. Singer & R.F. Wilson (Eds.) *Handbook on children, culture and violence*. Newbury Park, CA: Sage Publications.

Mechanic, M.B. (2004). Stalking victimization and intimate partner violence. In T. Jackson & L. VandeCreek (Eds.) *Innovations in Clinical Practice: A sourcebook*. Sarasota, FL: Professional Resource Press, pp. 21-34.

Mechanic, M.B. (2003). Responding to the psychological impact of stalking. In M. Brewster (Ed.) *Stalkers and their Victims: Psychology, law, risk factors and interventions*. Kingston, N.J.: Civic Research Institute, Chapter 11, pp. 11_1-11_22.

Mechanic, M.B. (2001). Stalking Victimization: Clinical implications for assessment and intervention. in K.E. Davis, I.H. Frieze & R.E. Maiuro (Eds.) *Stalking and obsessive behavior: Perspectives on victims and perpetrators*. Springer Publications. pp. 31-61.

Mechanic, M.B. (1996). Battered women, homicide and the legal system. In A.R. Roberts (Ed.) *Helping battered women: New perspectives and remedies*. New York: Oxford University Press, pp. 132-156.

Resick, P.A., & Mechanic, M.B. (1995). Brief cognitive therapies for rape victims. In A.R. Roberts (Ed.) *Crisis Intervention and Time limited Treatment*. Newbury Park, CA: Sage Publications. pp. 91-126.

Other Publications

Mechanic, M.B. (2018, in press). *Risk Management Strategies for Dealing with Sexual Misconduct in the Workplace*. *The National Psychologist*.

- Mechanic, M.B. (2006). Needs of marginalized battered women. *Domestic Violence Report*, 11 (5), 65-66; 79-80.
- Mechanic, M.B. & Valdovinos, M. (2006). Multicultural perspectives on Intimate partner violence. *Domestic Violence Report*, 11 (3), 39-40.
- Mechanic, M.B. & Valdovinos, M. (2005). More effects of intimate partner abuse on Hispanic Victims. *Domestic Violence Report*, 10 (6), 87-88.
- Mechanic, M.B., & Valdovinos, M (June/July, 2005). The cultural context of abuse of Latinas. *Domestic Violence Report*, 10 (5), 65-67.
- Mechanic, M.B., & Valdovinos, M. (February/March, 2005). Intimate partner abuse in same-sex relationships. *Domestic Violence Report*, 10 (3), 38,41.
- Mechanic, M.B., & Valdovinos, M. (October/November, 2004). Intimate partner abuse experienced by Latinas: Part III. *Domestic Violence Report*, 10 (1), 16.
- Mechanic, M.B., & Valdovinos, M. (June/July, 2004). Intimate partner abuse experienced by Latinas: Part II. *Domestic Violence Report*, 9 (5), 69,73-76.
- Tang-Martinez, Z., Mechanic, M. B. (2001). A Natural History of Rape: Biological Bases of Sexual Coercion, *American Anthropologist*, 103, (4) 1222-1223. (book review).
- Mechanic, M.B. (2001). Autonomous Intimacy: Oxymoron or Necessary Precondition? *Psychology of Women Quarterly*, 25 (2), 169-170. Review of *The Search for Autonomous Intimacy: Sexual Abuse and Young Women's Identity Development*, M. Sue Crowley. NY: Peter Lang Publishing, 2000. 256 pp. (book review)
- Tang-Martinez, Z., & Mechanic, M.B. (May/June 2000). Response to Thornhill and Palmer on Rape. The Sciences: NY Academy of Sciences, page 3 (letter).

Technical Reports

- Beck, C.J.A, Walsh, M.E., Mechanic, M.B. Figuerido, A.J., & Mui-Kang, C. (2011). *Intimate partner abuse in mandatory custody mediation: Outcomes from a long-term multicultural study*. Final report, submitted to the National Institute of Justice, grant number 2007-WG-BX-0028.
- Mechanic, M.B., Sanders-Thompson, V., Shields, N., & Lee, R. (2003). *Violence against women prevention programming: A national survey of programs in use*. St Louis, MO: National Violence Against Women Prevention Research Center, University of Missouri-St. Louis.
- Mouradian, V.E., Mechanic, M.B., & Williams, L.M. (2001). *Recommendations for establishing and maintaining successful researcher-practitioner collaborations*. Wellesley, MA: National Violence Against Women Prevention Research Center, Wellesley College.

National Violence Against Women Prevention Research Center (May, 2001). *Fostering collaborations to prevent violence against women: Integrating findings from practitioner and researcher focus groups*. Charleston, SC. (Co-Author).

Resick, P. A., Mechanic, M. B., & Griffin, M. G. (1997). *Marital violence in the wake of the great flood of 1993*. Final report submitted to the National Institute of Mental Health, Grant #1 R03MH52513-01.

Manuscripts In Preparation

Mechanic, M.B., Weaver, T.L., & Resick, P.A. (in preparation). Subtypes of stalking among women exposed to intimate partner violence: A cluster analytic approach.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (in preparation). The roles of partner abuse, cognitive schemas, and emotional disengagement as contributors to PTSD and depression among battered women. Poster submitted to the 98th Annual Convention of the Western Psychological Association, Portland, OR

Unpublished Instruments

Mechanic, M.B. (unpublished measure) Cognitive Distortion Index.

Klein, D.N., Mechanic, M.B., & Miller, G.A. (unpublished instrument) A modified structured diagnostic interview.

Professional Presentations (peer-reviewed)

Lemon, N., Flanagan, T., & Mechanic, M.B. (2019, February). *Current developments in domestic violence law: Cases, statutes, threat assessment/management and the psychology behind it all*. Association of Family and Conciliation Courts Annual CA Conference, Costa Mesa, CA.

Hart, A., Escobar, M., Altamranio, V., Ahrens, C., & Mechanic, M.B. (2018, September). *Reasons why women of Mexican Heritage stay in abusive relationships*. Poster presented at the Institute on Violence and Trauma Conference, San Diego, CA.

Kim, M., Yoo, D., Lee, S., Aherns, C., & Mechanic, M.B. (2018, September). *Reasons why women of Mexican Heritage stay in abusive relationships*. Poster presented at the Institute on Violence and Trauma Conference, San Diego, CA.

Nguyen, J., Salazar, C., Prideaux, J., Gearhart, C., Ahrens, C., & Mechanic, M.B. (2018, September). *Reasons why women of Vietnamese heritage stay in their abusive relationships*. Poster presented at the Institute on Violence and Trauma Conference, San Diego, CA.

Vieira, J., Pattison, J., Stanger, A., Aherens, C., & Mechanic, M.B. (2018, September). *Reasons why European heritage women stay in abusive relationships*. Poster

presented at the Institute on Violence and Trauma Conference, San Diego, CA.

- Hart, A., Rodriguez, P., Gamez, E., Nunez-Jimenez, A., Mendoza, V., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, August). *Mexican-American survivors' recommendations for service providers*. Poster presented at the 126th Annual Convention of the American Psychological Association, San Francisco, CA.
- Yoo, D., Kong, E., Salazar, C., Lopez, J., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, August). *Korean-American survivors' recommendations for service providers*. Poster presented at the 126th Annual Convention of the American Psychological Association, San Francisco, CA.
- Nguyen, P., Mechanic, M., & Ahrens, C. (2018, August). *Vietnamese-American students' judgment of dating and marital violence: A pilot study*. Poster presented at the Annual Convention of the American Psychological Association, San Francisco, CA.
- Nguyen, P., Phan, S., Escobar, M., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, August). *Vietnamese-American survivors' recommendations for service providers*. Poster presented to the 126th Annual Convention of the American Psychological Association, San Francisco, CA.
- Russo, L., Liner, L., Freiborg, N., Pattison, J., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, August). *Intimate partner violence survivors' recommendations for service providers*. Poster presented at the 126th Annual Convention of the American Psychological Association, San Francisco, CA.
- Mechanic, M.B., Richards, K., & Rosenfeld, B. (2018, June). *Litigating sexual misconduct claims in the post-Weinstein #Me Too era*. Round Table Discussion presented at the International Forensic Mental Health Services Conference, Antwerp, Belgium.
- Ahrens, C., Gearhart, C., & Mechanic, C. (2018, May). *Barriers to accessing services among Vietnamese survivors of intimate partner violence*. In C. Ahrens (Chair), Designing research and services for underserved populations: Challenges and recommendations. Symposium presented at the 98th Annual Convention of the Western Psychological Association, Portland, OR.
- Hart, A., Escobar, M., Pattison, J., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, May). *'El Silencio': Understanding the influence of culture on the Mexican – American Woman's experience of abuse disclosure*. Poster presented at the 98th Annual Convention of the Western Psychological Association, Portland, OR.
- Mendoza, V., Lopez, J., Nguyen, A., Ruiz, R., Phan, S., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, May). *Social responses from friends and family upon intimate partner violence disclosure for Vietnamese American women*. Poster presented at the 98th Annual Convention of the Western Psychological Association, Portland, OR.
- Russo, L., Nguyen, P., Salazar, C., Liner, L., Gearhart, C., Ahrens, C., & Mechanic, M. (2018,

- May). *Social responses toward Korean American survivors of intimate partner violence*. Poster presented at the 98th Annual Convention of the Western Psychological Association, Portland, OR.
- Nguyen, P., Mechanic, M.B., & Ahrens, C.A. (2018, April). *The influence of acculturation, patriarchal beliefs, and attitudes towards women on Vietnamese-American students' perceptions of intimate partner violence*. Poster presented at the 98th Annual Convention of the Western Psychological Association, Portland, OR.
- Mechanic, M.B. *Expert evidence on counterintuitive victim behavior in cases involving intimate partner and sexual violence: Conceptualizing victim responses through an interpersonal rather than a criminological lens* (2017, October). Paper presented at "Safer Communities, Safer Relationships," Conference, Prato, Italy.
- Gearhart, C., Light, L., Ahrens, C., & Mechanic, M. (2016, October). *Working with diverse survivors of intimate partner violence*. Poster presented at the Orange County Women's Health Conference, Fullerton, CA.
- Mechanic, M.B. (March, 2017). *Research, teaching, and forensic practice on violence against women: A translational science example* In M.B. Mechanic (Chair), *From the Laboratory to the Courtroom: An Exploration of Translational Psychology in the Field of Psychology and Law*. Symposium presented at American Psychology Law Society. Seattle, WA.
- Mechanic, M.B., *intimate partner violence in child custody and visitation cases*. Annual Meeting of the California Association of Family and Conciliation Courts. Costa Mesa, CA, February, 2017.
- Ari, S., Altamirano, V., Rodriguez, P., & Ahrens, C. (2017, January). *Mexican migrant survivors' reasons for staying in or leaving abusive relationships*. Poster presented at the 2017 National Multicultural Conference and Summit, Portland, OR.
- Gearhart, C., Light, L., Ahrens, C., & Mechanic, M. (2016, October). *Working with diverse survivors of intimate partner violence*. Poster presented at the Orange County Women's Health Conference, Fullerton, CA.
- Mechanic, M.B. (August, 2016). Discussant. In C. Beck (Chair), *Researcher-community partnerships: making complex relationships work*. Symposium presented at the Annual Meeting of the American Psychological Association, Denver, CO
- Gomez, A., Morales, M., Gearhart, C., & Ahrens, C. (2016, March). *Measuring intimate partner violence among Mexican immigrant women: A mixed method pilot study*. Poster presented at the 5th Annual Latino Health Equity Conference.
- Mechanic, M.B. (April, 2016). *Using research on violence against women in legal cases involving victims of sexual assault, stalking, and intimate partner abuse*. In C. Ahrens (chair), *Translational research to address violence against women*. Paper presented at the

Annual Meeting of the Western Psychological Association, Long Beach, CA.

Mechanic, M. B. (March, 2016). *Social framework testimony on counterintuitive victim behaviors in trials for sexual assault*. In M. Mechanic (Chair) Social framework evidence in court: Contributions and controversies from five Areas of psycholegal research. Paper presented at the American Psychology Law Society Conference, Atlanta, GA.

Ahrens, C., Mechanic, M.B., & Fehler-Cabral, G., (August, 2015). *Researching intimate partner violence in the Vietnamese and Korean-American community*. In M. Mechanic (Chair). Trauma and Resilience Among Diverse Survivors of Violence Against Women and Girls. Paper presented at the Annual Meeting of the American Psychological Association, Toronto, Canada.

Mechanic, M.B. (March, 2015). Discussant. (March, 2015). In R. Davidson (Chair), *Researcher-Community Agency Partnerships: Practical for Making Complex Relationships Work*. Symposium presented at the Annual Meeting of the American-Psychology Law Society, San Diego, CA.

Teutscher, J.M., Mechanic, M.B., Goetz, A.T., & Preston, K.S.J. (2014, November). *Victimization history and its effect on women's use of rape avoidance behaviors*. Poster presented at the International Society for Traumatic Stress Studies, Miami, FL

Mechanic, M.B. (2014, June). *Expert Testimony in Cases involving Trauma, Violence, or Victimization*. In M. O'Connor (Chair), Panel Discussion, Achieving Effective Advocacy through Training Lawyers in Relevant Psychological. Society for the Psychological Study of Social Issues (SPSSI) Biennial Conference (Portland, OR).

Mechanic, M.B. (2014, April). *Examining the cultural context of Intimate Partner Violence*. Paper presented at the Annual Meeting of the Western Psychological Association (Portland, OR)

Mechanic, M.B., Griffin, M.G., Newton, T., Gahn, R., & Resick, P.A. (2013, November). *The Impact of Intimate Partner Stalking on PTSD and Psychophysiological Reactivity in Survivors of Intimate Partner Violence*. Paper presented at Annual Meeting of the International Society for Traumatic Stress Studies, Philadelphia, PA.

Osann, K., Mechanic, M.B., Hsieh, S., Nelson, E., & Wenzel, L (2013, October). *Social Support and Coping among Hispanic and non-Hispanic Women participating in a Randomized Counseling Trial for Cervical Cancer Survivors*. Paper presented at Annual Meeting of the International Society for Quality of Life Research (Miami, FL).

Mechanic, M.B., & Pole, N. (2013, March). *Conducting Ethnoculturally Sensitive research on Psycholegal Topics: Intimate Partner Violence as an Exemplar*. In C. Beck (Chair).

Conceptual/methodological Issues in Culturally Responsive Psycholegal Research: Four Empirical Illustrations of Intimate Partner Violence Research. Paper presented at the American Psychology-Law Society, Portland, OR.

- Beck, C., Mechanic, M.B., & Davidson, R.D. (2013, March). *Ethnic differences in couple-level patterns of intimate partner violence in divorcing parents mediating custody and parenting time disputes*. In C. Beck (Chair). Conceptual/methodological Issues in Culturally Responsive Psycholegal Research: Four Empirical Illustrations of Intimate Partner Violence Research. Paper presented at the American Psychology-Law Society, Portland, OR.
- Mechanic, M.B., Valdovinos, M.G., & Pedroza, V. (2012, November). *Discriminating service utilization patterns among severely battered women*. Paper presented at the Association for Behavior and Cognitive Therapy, Baltimore, MD.
- Shepherd-McMullin, C.E., Mearns, J., Stokes, J., & Mechanic, M.B. (2012, April). *Negative mood regulation expectancies moderate psychological abuse on avoidant coping*. Poster presented at the annual Meeting of the Western Psychological Association, San Francisco, CA.
- McIndoo, C.C., Scher, C.D., Mechanic, M.B., & Gerkens, D.R. (2011, November). *An investigation of cognitive interference: Intrusive words recalled by individuals with and without a history of physical assault following an emotional Stroop task*. Poster presented at the annual meeting of the Association for Behavioral and Cognitive Therapies, Toronto, ON Canada.
- Gravel, K. L., Scher, C. D., Miller, S., & Mechanic, M. B. (2009, April). *The effects of looming vulnerability on test anxiety and performance*. Poster presented at the annual meeting of the Western Psychological Association.
- Mechanic, M.B. (April, 2008). *The use of experiential learning approaches in teaching about trauma*. In M.B. Mechanic (Chair), Teaching Trauma: Experiential Methods, Pedagogy and Pitfalls, Symposium presented at the annual meeting of the Western Psychological Association Conference, Irvine, CA.
- Beck, C.J.A., & Mechanic, M.B. (March, 2008). *Intimate partner violence screening and accommodations provided in mandatory divorce mediation*. Paper presented at the American Psychology Law Society Meeting, Jacksonville, FL.
- Daferty, T., O'Connor, M., & Mechanic, M.B. (2007, August). *Gender intrusive questioning of expert witnesses*. Poster presented at the Annual Meeting of the American Psychological Association Convention, San Francisco, CA.
- Kloeppel, E., Mechanic, M.B., Marelich, W., & Blackman, M. (2007, March). *Workplace disclosure of intimate partner abuse: An examination of supervisor and coworker support*. In C. Ahrens (Chair), Silenced: non-disclosure among survivors of interpersonal

violence. Symposium presented at the 32nd Annual meeting of the Association of Women in Psychology, San Francisco, CA.

Segal, N.L., Seghers, J.P., Marelich, W.D., Chavarria, K., & and Mechanic, M. (May, 2007) A twin-family study of social closeness: Aunts, uncles, nieces and nephews. Human Behavior and Evolution Society, Williamsburg, VA. (research symposium)

Mechanic, M.B. (2006, October). *Teaching trauma: The use of student documentaries as an experiential tool*. In T.L. Weaver (Chair). Experiential learning: Ways of engaging undergraduate and graduate students in trauma education. Panel presented at the 22nd Annual meeting of the International Society for Traumatic Stress Studies, Hollywood, CA.

Segal, N.L., Seghers, J.P., Chavarria, K., Marelich, W., Mechanic, M. B. & Castillo, R. (2006, May). *Social closeness between twin parents and their nieces and nephews*. American Psychological Society, New York City, NY.

Segal, N.L., Seghers, J.P., Chavarria, K., Marelich, W. & Mechanic, M.(2006, June). *Social closeness and gift-giving to nieces and nephews: A twin-family study*. Human Behavior and Evolution Society, Philadelphia, PA.

Valdovinos, M. G., & Mechanic, M.B. (2006, April). *Parenting among abused Latinas: Results from a qualitative study*. In M.B. Mechanic (Chair) Intimate Partner Violence Among Latinos: The Role of Cultural Context. Symposium presented to the 86th Annual Meeting of the Western Psychological Association.

Mechanic, M.B., Seghers, J., Marelich, W., & Resick, P. A. (2006, March). *Stalking and intimate partner violence; Identification of homogenous subgroups*. In C. Sinclair (Chair) Advances in research on stalking. Symposium presented at the American Psychology Law Society, St. Petersburg, FL.

Panuzio, J., Taft, C. T., Resick, P. A., Vogt, D. S., & Mechanic, M. B. (2005, November). *Coping and mental health among battered women*. Poster presented at the annual meeting of the Association for Behavioral and Cognitive Therapies, Washington, DC.

Panuzio, J., Taft, C. T., Resick, P. A., Vogt, D. S., & Mechanic, M. B. (2005, November). *Examining correlates of engagement and disengagement coping among battered women*. Poster presented at the annual meeting of the Association for Behavioral and Cognitive Therapies, Washington, DC.

Seghers, J., Mechanic, M., Marelich, W., & Resick, P.A. (2005, November). *Identification of homogenous sub-groups of battered women*. Poster presented at the International Society of Traumatic Stress Studies, Toronto, Canada

- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2005, November). *Stalking as a contributor to PTSD and depression among battered women*. Poster presented at the International Society of Traumatic Stress Studies, Toronto, Canada.
- Valdovinos, M., & Mechanic, M.B. (2005, July). *An exploration of marital sexual coercion and machismo among Latina women*. Paper presented at the 9th International New Family Violence Research Conference, Durham, New Hampshire.
- Valdovinos, M., Pedroza, V., Mechanic, M.B., & Resick, P.A. (2005, April). *Sheltered vs. nonsheltered battered women: An examination of cluste-based subtypes*. Poster presented at the Annual Meeting of the Western Psychological Association, Portland, OR.
- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2005, March) *The unique role of stalking as a predictor of physical injuries, PTSD, and depression among battered women*. In M.B. Mechanic (Chair), *Stalking: New directions in Research on Definitions, Victim Response and Offender Treatment*, Symposium presented at the Annual Meeting of the American Psychology-Law Society, San Diego, CA.
- Shaked, N., & Mechanic, M.B. (2005, March). *Juror bias in capital trials: Reducing racial bias by means of instruction modification*. Poster presented at the Annual Meeting of the American Psychology-Law Society, San Diego, CA.
- Valdovinos, M. & Mechanic, M.B. (October, 2004). *An exploration of marital sexual coercion and machismo among Latina women*, Poster presented at the 12th Annual Mental Health and Cultural Competency Summit, Anaheim, CA.
- Taft, C.T., Resick, P.A., Mechanic, M.B., & Vogt, D.S. (November, 2004). *PTSD and Physical Health Among Help-Seeking Battered Women*. Paper presented at the International Society of Traumatic Stress Studies, New Orleans, LA.
- Valdovinos, M., Harris, D., Mechanic, M.B., Marelich, W., & Resick, P.A. (April, 2004,). *Patterns of stalking in battered women*. Poster presented at Western Psychological Association, Phoenix, AZ.
- Beck, C. J. A., Walsh, M., Taylor, C., & Mechanic, M. (April, 2004). *Domestic Violence in Couples Mandated to Attend Divorce Mediation*. Presented at Arizona Governor Janet Napolitano's "Ending Domestic Violence State-wide Training Conference", Scottsdale, AZ.
- Harris, D., Valdovinos, M., Mechanic, M.B., Marelich, W.D., & Resick, P.A. (April, 2004). *Mental health effects of stalking and intimate partner violence*. Poster presented at Western Psychological Association, Phoenix, AZ.
- Mechanic, M.B., Castillo, R. Marelich, W., & Resick, P.A. (March, 2004). *The functional role of*

cognitive distortions among battered women. In. T. Nichols (Chair), *Exiting Abusive Intimate Relationships: Assessment of Challenges and Outcomes.* Symposium presented to American Psychology Law Society, Scottsdale, AZ.

Beck, C., Walsh, M., Mechanic, M.B. & Taylor C. (March, 2004). *Domestic Violence in Couples Court-Mandated to Attend Divorce Mediation.* In. T. Nichols (Chair), *Exiting Abusive Intimate Relationships: Assessment of Challenges and Outcomes.* Symposium presented to American Psychology Law Society, Scottsdale, AZ.

Mechanic, M.B., Marelich, W., & Resick, P.A. (March, 2004). *Assessment of stalking as a risk factor for escalated violence among battered women.* In M. O'Connor (Chair), *Research on risk factors associated with stalking: Victim and offender perspectives.* Symposium presented at the American Psychology Law Society, Scottsdale, AZ.

Mechanic, M.B., Castillo, R., Marelich, W., & Resick, P.A. (October, 2003). *Cognitive distortion index: A measure of survival-based alterations in cognitions among battered women.* Toward a national research agenda on violence against women: A national research conference. University of Kentucky Center for Research on Violence Against Women, Lexington, KY.

Mechanic, M.B. (October, 2003). *Mental health effects of victimization: Current Research Directions.* Toward a national research agenda on violence against women: A national research conference. University of Kentucky Center for Research on Violence Against Women, Lexington, KY.

Lee, R., Shields, N., Sanders, V., & Mechanic, M.B. (April, 2003). *Violence against women prevention programming: Who we are and what we use.* Paper presented at the Annual meeting of the Midwest Sociological Society, Chicago, IL.

Mechanic, M.B., & Resick, P.A. (November, 2002). *Coping and chronic violence exposure: The relationship between spontaneous and effortful avoidant strategies.* In S. Lewis (Chair). *Coping and service utilization for victims of chronic domestic assault.* Symposium presented at the 18th Annual Meeting of the International Society for Traumatic Stress Studies, Baltimore, MD.

Waldrop, A., Resick, P., & Mechanic, M. B. (November, 2002). *Coping with violence: Battered women's perspectives on helping sources.* In S. Lewis (Chair). *Coping and service utilization for victims of chronic domestic assault.* Symposium presented at the 18th Annual Meeting of the International Society for Traumatic Stress Studies, Baltimore, MD.

Griffin, M.G., Resick, P.A., & Mechanic, M.B. (November, 2002). *Psychophysiological reactivity in domestic violence victims.* In J. Hopper (Chair). *Biology research on PTSD: Addressing complexity and clinical issues.* Symposium presented at the 18th Annual Meeting of the International Society for Traumatic Stress Studies, Baltimore, MD.

- Mechanic, M.B., Kaysen, D.L., & Resick, P.A. (March, 2002). *Stalking, perceptions of lethality, and posttraumatic responding among recently battered women*. In M.B. Mechanic (Chair) "I'll be watching you:" Legal, clinical and social policy implications of recent stalking research. Symposium presented at the American-Psychology Law Society (APLS) Association Biennial Meeting, Austin, TX.
- Mechanic, M.B., & Resick, P.A. (December, 2001). *Mental health consequences of multiple forms of partner abuse*. In M.B. Mechanic (Chair) Multiple dimensions of partner abuse: Physical and mental health outcomes. Symposium presented at the 17th Annual Meeting of the International Society for Traumatic Stress Studies (New Orleans, LA).
- Mechanic, M.B., & Rose, S. (December, 2001). *Hate crime victimization: Help-seeking, disclosure, and symptom status*. Poster presented at the 17th Annual Meeting of the International Society for Traumatic Stress Studies (New Orleans, LA).
- Mechanic, M.B., & Resick, P.A. (December, 2001). *Violence against women researcher-practitioner collaboration: Findings from practitioner focus groups*. In D.G. Kilpatrick (Chair) How the National Violence Against Women Prevention Research Center helps researcher-community collaboration. Workshop presented at the 17th Annual Meeting of the International Society for Traumatic Stress Studies (New Orleans, LA).
- Mechanic, M.B., & Resick, P.A. (August, 2001). *Fostering collaborations to prevent violence against women: Findings from practitioner focus groups*. In D.G. Kilpatrick (Chair) Can violence against women researchers and practitioner—advocates just get along? Paper presented at the annual American Psychological Association Convention (San Francisco, CA).
- Resick, P.A., & Mechanic, M. B. (2001, July). *Types of abuse, cognitive schemas and dissociation among battered women*. In C.R. Brewin (Chair) Dissociative processes in psychopathology: Clinical Applications. Paper presented at the World Congress of Behavioral and Cognitive Therapies, Vancouver, British Columbia.
- Mechanic, M.B., & Resick, P.A. (2000, November). *Cognitive distortion index: Assessment of abuse-related cognitions among battered women*. Poster presented at the 16th Annual Meeting of the International Society for Traumatic Stress Studies, San Antonio, TX.
- O'Connor, M. & Mechanic, M.B. (2000, June). *A Broader exploration of the role of gender in expert testimony*. In M. O'Connor (Chair) Sex of the expert: An empirical and experiential view. Paper presented at the Society for the Psychological Study of Social Issues, Minneapolis.
- Resick, P.A., Nishith, P., Griffin, M., Mechanic, M., & Weaver, T.L. (2000, March,). *PTSD and depression comorbidity: Prospective study and treatment outcome results*. Paper presented at the 3rd World Congress for the International Society for Traumatic Stress Studies, Melbourne, Australia.

- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (1999, November). *Intimate partner violence and stalking behavior: Exploration of patterns and correlates in a sample of acutely battered women*. Paper presented at the 15th Annual Meeting of the International Society for Traumatic Stress Studies, Miami.
- Griffin, M.G., Resick, P.A., & Mechanic, M.B. (1999, November). *Psychophysiological alterations related to peritraumatic dissociation in domestic violence victims*. Paper presented at the 15th Annual Meeting of the International Society for Traumatic Stress Studies, Miami.
- Grubaugh, A., Waldrop, A., Mechanic, M.B., & Resick, P.A. (1999, November). *Alternative and investment as predictors of domestic violence victims self-schemas*. Poster presented at the 15th Annual Meeting of the International Society for Traumatic Stress Studies, Miami.
- Rose, S., & Mechanic, M. (1999, October). *Homophobic bias crimes: An examination of crime features, psychological distress and helpseeking behavior*. Hate Crimes Conference sponsored by UCLA and the Society for the Psychological Study of Social Issues (SPISSI), Los Angeles, CA.
- Williams, A.M., & Mechanic, M.B. (1998, November). *The disruption of meaning: An analysis of schema change in sexual assault survivors with PTSD*. Poster presented at the 32nd Annual Convention of the Advancement for Behavior Therapy, Washington, D.C.
- Feuer, C., Mechanic, M.B. & Resick, P.A. (1998, November). *ASD and PTSD in sexual and physical assault survivors*. Paper presented at the Fourteenth Annual Meeting of the International Society for Traumatic Stress Studies, Washington, D.C.
- Evans, T.W., Uhlmansiek, M.H., Resick, P.A., Griffin, M.G., & Mechanic, M.B. (1998, November). *The effects of disaster-related damage, social support, coping and PTSD on distressed and nondistressed dyads following the great flood of 1993*. Poster presented at the Fourteenth Annual Meeting of the International Society for Traumatic Stress Studies, Washington, D.C.
- Mechanic, M.B., Resick, P.A., Griffin, M.G., & Astin, M.C. (1997, November). *Development of a measure to assess cognitive distortions in battered women*. Paper presented at the 31st. Annual Convention of the Advancement of Behavior Therapy, Miami, Fla.
- Resick, P.A., Mechanic, M.B., & Griffin, M.G. (1997, November). *Cognitions and recovery in rape and assault victims: A prospective study*. Paper presented at the 31st. Annual Convention of the Advancement of Behavior Therapy, Miami, Fla.
- Nishith, P., Mechanic, M.B., & Resick, P.A. (1997, November). *Childhood sexual and physical abuse as predictors of adult sexual and physical revictimization in a sample of female crime victims*. In M. Cloitre (Chair) Sexual revictimization of women: risk factors and

prevention strategies. Symposium presented at the 31st. Annual Convention of the Advancement of Behavior Therapy, Miami, Fla.

Astin, M.C., Resick, P.A. & Mechanic, M.B. *Battered women: An information processing model of predicting PTSD and depression* (1997, November). Paper presented at the 13th Annual Meeting of International Society of Traumatic Stress Studies, Montreal, Canada.

Mechanic, M.B., Maguire, M., Resick, P.A., & Griffin, M.G. (1996, November). *Rape trauma narratives: Coherence and recovery from trauma*. In S. Orsillo (Chair). Narrative accounts of traumatic experience, Symposium presented at the 30th Annual Convention of the Association for the Advancement of Behavior Therapy, New York, New York.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1996, November). *Traumatic memory in recent victims of sexual assault*. In R.J. McNally (Chair). Memory in survivors of sexual violence. Symposium presented at the 30th Annual Convention of the Association for the Advancement of Behavior Therapy, New York, New York.

Mechanic, M.B., Griffin, M.G. & Resick, P.A. (1995, November). *Traumatic stress reactions following disaster: The mediating impact of marital conflict, marital satisfaction and coping*. In D.S. Riggs (Chair) The impact of relationship factors on post-traumatic stress responses. Symposium presented at the 29th Annual Convention of the Association for the Advancement of Behavior Therapy, Washington, D.C.

Mechanic, M.B., Griffin, M.G., & Resick, P.A. (1995, November). *Narrative accounts of rape Assessing naturalistic changes as evidence of information processing*. Paper presented at the 29th Annual Convention of the Association for the Advancement of Behavior Therapy, Washington, D.C.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1995, November). *Narrative accounts of rape: Is there evidence of information processing?* Paper presented at the 11th Annual Meeting of the International Society for Traumatic Stress Studies, Boston, MA.

Nishith, P., Mechanic, M.B., Griffin, M.G., & Resick, P.A. (November, 1995). *Peritraumatic dissociation and chronic PTSD in rape victims*. Paper presented at the 11th Annual Meeting of the International Society for Traumatic Stress Studies, Boston, MA.

Resick, P.A., Griffin, M.G., Mechanic, M.B. & Trusty, M.L. (1995, November). *Marital abuse in the wake of disaster: Testing a model*. Paper presented at the 29th Annual Convention of the Association for the Advancement of Behavior Therapy, Washington, D.C.

Mechanic, M.B. (1995, June). *Battered Woman Syndrome: The impact of expert testimony on juror decision making*. Paper presented at the Annual Meeting of the Law and Society Association, Toronto, Canada.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1994, November). *The role of cognitive*

schemata in persistent PTSD following sexual assault. In M.B. Mechanic and D.S. Riggs (Co-Chairs) Cognitive schemata in female victims of sexual assault. Symposium presented at the 28th Annual Convention of the Association for the Advancement of Behavior Therapy, San Diego, CA.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1994, November). *Post-rape reactions: Does knowing the rapist make a difference?* In M.B. Mechanic and D.S. Riggs (Co-Chairs) PTSD: a search for subtypes. Symposium presented at the 28th Annual Convention of the Association for the Advancement of Behavior Therapy, San Diego, CA.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1994, November). *Acute stress disorder following sexual assault: A first glance.* In D.E. Hearst-Ikeda and M.B. Mechanic (Co-Chairs) Dissociation and trauma. Symposium presented at the 10th Annual Meeting of the International Society for Traumatic Stress Studies, Chicago, IL.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1994, November). *Cognitive schemata and coping strategies in persistent PTSD following sexual assault.* In M.B. Mechanic and D.S. Riggs (Co Chairs) Cognitive schemata in post-traumatic stress disorder. Symposium the 10th Annual Meeting of the International Society for Traumatic Stress Studies, Chicago, IL.

Griffin, M.G., Resick, P.A., & Mechanic, M.B. (1994, November). *Are there subtypes of PTSD?: Physiological and non-verbal evidence.* In M.B. Mechanic and D.S. Riggs (Co-Chairs) PTSD: a search for subtypes. Symposium presented at the 28th Annual Convention of the Association for the Advancement of Behavior Therapy, San Diego, CA.

Griffin, M.G., Resick, P.A., Mechanic, M.B. (1994, November). *Psychophysiological and nonverbal assessment of peritraumatic dissociation in rape victims.* In M.G. Griffin (Chair) Objective indicators of dissociation in Post-Traumatic Stress Disorder. Symposium presented at the 10th Annual Meeting of the International Society for Traumatic Stress Studies, Chicago, IL.

Resick, P.A., Mechanic, M.B., Griffin, M.G., & Spengel, L (1994, November). Marital adjustment and violence in the wake of the great flood of 1993. In P.A. Resick (Chair) *Coping with disaster: Symptoms and interpersonal effects.* Symposium presented at the 10th Annual Meeting of the International Society for Traumatic Stress Studies, Chicago, IL.

Mechanic, M.B., & Resick, P.A. (1994, July). *An approach to treating post-traumatic stress disorder and depression.* In J.D. Maser (Chair), Research based treatments. Symposium presented at the 20th Annual Meeting of the National Association for Rural Mental Health, Des Moines, IA.

Mechanic, M.B. & Resick, P.A. (1994, June). *Participation in the legal process following sexual*

assault: Implications for recovery. In K.A. Fischer (Chair), Gender, voice, and legal consciousness. Symposium presented at the Annual Meeting of the Law and Society Association, Phoenix, AZ.

Mechanic, M.B. & Resick, P.A. (1993, October). *The personal beliefs and reactions scale: Assessing rape-related cognitive schemata.* In P.A. Resick (Chair), The role of cognition in PTSD. Symposium conducted at the 9th Annual Meeting of the International Society for Traumatic Stress Studies, San Antonio, TX.

Mechanic, M.B., Resick, P.A., Schnicke, M.K., & Griffin, M.G. (1993, November). *The impact of guilt and self-blame on recovery from PTSD in rape victims.* In E.S. Kubany (Chair), Assessment and treatment of trauma related guilt. Symposium conducted at the 27th Annual Convention of the Association for the Advancement of Behavior Therapy, Atlanta, GA.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1993, November). *Rape-related PTSD: Comorbidity of DSMIII-R Axis I disorders and associated symptoms.* In D.E. Hearst (Chair), Collateral symptoms in women with PTSD: Depression, physical health, sexual, and interpersonal adjustment. Symposium conducted at the 27th Annual Convention of the Association for the Advancement of Behavior Therapy, Atlanta, GA.

Mechanic, M.B. & Aber, M. (1992, March) *Battered woman syndrome: Development of a measure to assess juror common knowledge.* Poster presented at the Biennial Meeting of the American Psychology Law Society (APLS), San Diego, California.

Hoge, S.K., Oberlander, L., Mechanic, M.B., & Monahan, J. (1992, August). *Coercion in the hospitalization process: Clinical variables and perceptions of coercion.* Paper presented at the 10th Annual Meeting of the American Psychological Association, Washington, D.C.

Mechanic, M.B., Miller, G.M., & Klein, D.N. (1986, August). *Assessment and differentiation of chronic depression in a non-patient sample.* Paper presented at the 94th Annual Meeting of the American Psychological Association, Washington, D.C.

Mechanic, M.B., & Abramson, P.R. (1981). *Sexuality and the media: Three decades of best selling novels and top rated films from 1959-1979.* Paper presented at the Western Psychology Conference for Undergraduate Research, Santa Clara, California.

Invited Professional Presentations and Workshops

Mechanic, M.B. (January, 2019). *Intimate Partner Violence and Sexual Assault: Understanding victim responses.* Training presented for the Marines Special Victim Legal Counsel Training.

Mechanic, M.B. (December, 2018). *Sexual assault: Understanding the complexities of victim*

behaviors and reactions. Training presented for the Los Angeles County District Attorney's Association, Los Angeles, CA.

Mechanic, M.B. (September, 2018). *Sexual assault: Understanding the complexities of victim behaviors and reactions*. Presentation to the California Medical Board Sexual Assault Investigators. Diamond Bar, CA.

Mechanic, M.B. (October, 2018). *Sexual assault: Understanding the complexities of victim behaviors and reactions*. Presentation to the California Medical Board Sexual Assault Investigators. Sacramento, CA.

Mechanic, M.B. (January, 2018). *Sexual assault: Understanding the complexities of victim behaviors and reactions*. Presentation to the U.S. Military 9th Special Victim Counsel Certification Course. Charlottesville, VA.

Mechanic, M.B. (January, 2018). *Promoting resilience when working with sexual trauma survivors*. Presentation to U.S. Military 9th Special Victim Counsel Certification Course. Charlottesville, VA.

Mechanic, M.B. (February, 2017). *Trauma-informed legal advocacy: Fostering resilience when working with victims*. Presentation to U.S. Marine Corps Special Legal Counsel Training. Camp Pendelton, CA.

Mechanic, M.B. (February, 2017). *Risk assessment for Attorneys: Assessing harm to self and others for special victims legal counsel*. Presentation to Marine Corps Special Legal Counsel Training. Camp Pendelton, CA.

Mechanic, M.B. (2016, August). *Sexual assault victim dynamics*. Presentation to the Washington and Multnomah County, OR Prosecutor, Law Enforcement, and Victim Advocate Training. Hillsboro, OR.

Mechanic, M.B. (2016, August). *Fostering resilience and avoiding vicarious trauma when working with victims*. Presentation to the Washington and Multnomah Counties Prosecutor, Law Enforcement, and Victim Advocate Training. Hillsboro, OR.

Mechanic, M.B. (2016, August). *Sexual assault victim dynamics*. Presentation to U.S. Military 7th Special Victim Counsel Certification Course. Charlottesville, VA.

Mechanic, M.B. (2016, August). *Trauma-informed legal advocacy: Fostering resilience when working with victims*. Presentation to U.S. Military 7th Special Victim Counsel Certification Course. Charlottesville, VA.

Mechanic, M.B. (2016, July). *Sexual assault cases: Counterintuitive victim behavior, offender dynamic, and effective communication with victims*. Plenary address for the U.S. Army Special Victim Prosecutor Training. Ft. Belvoir, VA.

- Mechanic, M.B. (2016, July). *Trauma informed legal advocacy and promoting personal resilience among special victim prosecutors*. Presentation for the U.S. Army Special Victim Prosecutor Training. Ft. Belvoir, VA.
- Mechanic, M.B. (2016, January). *Sexual assault victim and offender behavior*. U.S. Military 6th Special Victim Counsel Certification Course. Charlottesville, VA.
- Mechanic, M.B. (2016, January). *Trauma-informed legal advocacy: Fostering resilience when working with victims*. U.S. Military 6th Special Victim Counsel Certification Course. Charlottesville, VA.
- Mechanic, M.B. (2015, September). *Counterintuitive Victim Behavior: Use of expert testimony in sexual assault prosecution*. Presentation for the Sex Crimes Division, LA County District Attorney's Office Sex Crimes Division.
- Mechanic, M.B. (2015, July). *Counterintuitive Victim Behavior: Use of expert testimony in sexual assault prosecution*. Continuing Legal Education (CLE) program for the Ventura County District Attorney's Office.
- Mechanic, M.B. (2014, June). *Counterintuitive Victim Behavior Testimony in Rape and Sexual Assault Cases*. Invited presentation for the Los Angeles County District Attorney's Office Training Division.
- Mechanic, M.B. (2013, December). *Use of expert testimony to explain counterintuitive victim behaviors in sexual assault cases*. Invited presentation for the Los Angeles County Sex
- Mechanic, M.B. (2013, September). *Intimate Partner Battering and its Effects in Cases of Battered Women Charged with Crimes*. Invited presentation for the San Bernardino Public Defender's Office.
- Mechanic, M.B. (February, 2012). *Battered woman syndrome meets intimate partner battering and its effects: When social science concepts outpace legal Rubric*. Invited presentation for St. Louis University Law School Symposium on Battered Women Who Kill.
- Mechanic, M.B. (2011, April). *Forensic Psychology: What is it?* Presentation to CSUF student members of the American Psychology-Law Society.
- Mechanic, M.B. (2008, November). *Intimate Partner Violence and Battered Women Charged with Crimes*. Los Angeles County Bar Association Continuing Legal Education Seminar.
- Mechanic, M.B. (2008 July). *Children Exposed to Domestic Violence*. Invited presentation for the Alameda County Courts, Domestic Violence and Juvenile Court Training, Oakland, CA.

- Mechanic, M.B. (2007, October). *Child maltreatment and trauma: Considerations for capital defense work*. Paper presented at the Los Angeles County Public Defender Capital Defense Conference, Los Angeles, CA.
- Mechanic, M.B. (2007, February). *The challenges and advantages of collaborative research*. Paper presented at Research: Making science come to life in the hands of advocates. University of Kentucky, Center for Research on Violence Against Women.
- Mechanic, M.B. (2006, February). *Stalking and violence against women*. Paper presented for the Arizona Chapter of the Association of Family and Conciliation Courts, Sedona Arizona.
- Mechanic, M.B. (2005, May). *Intimate partner violence, stalking, and PTSD*. Paper presented at the VA Maryland Healthcare System conference on Women and PTSD, Baltimore, MD.
- Beck, C. J. A., Walsh, M., Taylor, C., & Mechanic, M. (2004, October). *Domestic Violence in Couples Mandated to Attend Divorce Mediation*. Presented at the Udall Center for Policy Studies, Tucson, AZ.
- Mechanic, M.B. (April, 2004). *Researcher-Practitioner Collaboration to Improve Research on Violence Against Women.: Findings from the NVAWPRC focus groups*. University of Kentucky, Violence Against Women Research Center.
- Mechanic, M.B. (March, 2004). *Expert testimony on the effects of battering*. Invited presentation for the Missouri Coalition Against Domestic Violence Conference on Expert Testimony. St. Louis, Missouri.
- Mechanic, M.B. (November, 2003). *Anxiety Disorders and Women*. Anxiety Disorders of Association of America. Chantilly, Virginia.
- Mechanic, M.B. (October, 2003). *Mental Health Consequences of Violence Against Women*. Toward a national research agenda on violence against women: A national research conference. University of Kentucky Center for Research on Violence Against Women, Lexington, KY.
- Mechanic, M.B. (2003, April). *Expert testimony on the effects of battering*. Invited presentation for the Missouri Coalition Against Domestic Violence Conference on Expert Testimony. St. Louis, Missouri.
- Mechanic, M.B. (2002, March). *Nature and dynamics of domestic violence: Relevance for the practice of law*. Workshop presented for the Missouri Bar Association. Lake of the Ozarks, MO.
- O'Brien, S., & Mechanic, M.B. (2002, March). *Defending battered women charged with crimes*. Workshop presented for the Missouri Bar Association. Lake of the Ozarks, MO.

- Mechanic, M.B. (2002, March). *Child maltreatment and intimate partner violence*. Invited address presented for the Jefferson County, Missouri Family Court Conference.
- Mechanic, M.B. (2001, December). Expert witness commentator in: *The relevance of domestic violence in the courtroom: Expert testimony in a duress case-Mock Trial*. Co-sponsored by the American Bar Association Commission on Domestic Violence and Criminal Justice Section and the International Society for Traumatic Stress Studies. New Orleans, LA.
- Mechanic, M.B. (2001, May). *The intersection of stalking and intimate partner abuse*. The first research conference on stalking. Rutgers University, New Brunswick, NJ.
- Mechanic, M.B. (2001, January). *Expert witness testimony: Consideration of domestic violence in child custody determinations*. Legal services training sponsored by the Missouri Coalition Against Domestic Violence.
- Mechanic, M.B. (2001, January). *Domestic violence and Child maltreatment: Legal and Psychological Intersection*. Presentation for the St. Louis Family Court Guardian Ad Litem Training.
- Mechanic, M.B. (2000, October). *Preliminary findings from an NIMH study of 350 Battered Women*. Colloquium presented at the Center for Trauma Recovery, University of Missouri-St. Louis.
- Mechanic, M.B. (2000, May). *The intersection between child maltreatment and domestic violence*. Presentation for the Annual Jefferson County Family Violence Council Training.
- Mechanic, M.B. (2000, May). *Working effectively with expert witnesses in domestic violence cases*. Workshop presented at the Illinois Coalition Against Domestic Violence Annual Legal Conference.
- Mechanic, M.B. (2000, April). *Secondary trauma associated with representing battered women*. Workshop presented at Legal Services of Eastern Missouri.
- Mechanic, M.B., & Weaver, T.W. (2000, January). *Domestic violence: The relationship to child abuse and neglect*. Presentation for the 22nd Judicial Circuit (City of St. Louis) Court Improvement Project.
- Mechanic, M.B. (1999, January). *Vicarious traumatization: Impact of trauma work on trauma workers: Part 2*. Workshop presented for the staff at the Kathy J. Weinman Shelter for Battered Women, St. Louis, MO.
- Mechanic, M.B. (1998, December). *Vicarious traumatization: Impact of trauma work on trauma*

workers: Part I. Workshop presented for the staff at the Kathy J. Weinman Shelter for Battered Women, St.. Louis, MO.

Mechanic, M.B. (1998,October). *Spousal abuse and workplace violence*. Invited presentation for the mid-year educational conference of the American College of Legal Medicine. St. Louis, MO.

Mechanic, M.B. (1997, November). *Acquaintance rape: Developing awareness and decreasing risk*. Invited presentation for COPS series sponsored by the University of Missouri Police Department.

Mechanic, M.B. (1997, November). *Criminal forensic assessment*. Colloquium presented for the University of Missouri-St. Louis Clerkship Seminar Series.

Mechanic, M.B. (1997, November). *Forensic psychological assessment: On being a psychological skeptic*. Colloquium presented at the University of Missouri-St. Louis, Department of Psychology Colloquium Series.

Mechanic, M.B. (1997, November). *Psychological sequelae of traumatic events: Part I. Overview and conceptual frameworks*. Invited workshop presented for Provident Counseling Center.

Mechanic, M.B. (1997 November). *Psychological sequelae of traumatic events: Part II: Using structured diagnostic interviews to assess trauma history and posttraumatic symptoms*. Invited Workshop presented for Provident Counseling Center.

Mechanic, M.B. (1997, November). *Sexual trauma: Conceptualization and intervention strategies*. Invited workshop at the University of Missouri-St. Louis Counseling Services Center.

Mechanic, M.B. (1997, May). *Sexual trauma and posttraumatic stress disorder*. Invited workshop presented for the Family Court of St. Louis County.

Mechanic, M.B., & Weaver, T.L. (1997, April). *Battered women: Sequelae of trauma*. Continuing Medical Education Workshop, St. Joseph's Medical Center.

Mechanic, M.B. (1997, February). *Violence, trauma and PTSD*. Invited workshop for the Mental Health Association of Greater St. Louis.

Mechanic, M.B. (1997, January). *Memory for sexual trauma*. Invited presentation for the ProWomen Therapists Group.

Mechanic, M.B. (1996, April). *Women and trauma*: Invited presentation for the ProWomen Therapists Group.

Mechanic, M.B. (1994, March). *Rape: Fact vs. Fiction*. Presentation for the University of

Missouri Noon Cultural Series.

Mechanic, M.B. (1994, April). *Date Rape: Myths and Realities*. Presentation for the University of Missouri Women's Center.

Cornell, D., Hawk, G.L. & Mechanic, M.B. (1992, February). *Family homicide: Forensic assessment issues*. Paper presented at the Advanced Forensic Evaluation Training Program, Institute of Law, Psychiatry and Public Policy, University of Virginia.

Mechanic, M.B., Hawk, G., & Lombardo, P.A. (1991, May). *Battered woman syndrome*. Workshop presented at the 20th Semi-Annual Forensic Symposium, University of Virginia, Charlottesville.

Mechanic, M.B. (1990, February). Battered women and the criminal law. Paper presented at the Advanced Forensic Training Program, Institute of Law, Psychiatry & Public Policy, University of Virginia.

Awards

Nominated for Best Paper of 2008, in the Journal, Violence Against Women

Selected Teaching Experience

Fall, 2011	<u>California State University, Fullerton, Instructor</u> Psychology 331: Psychology of Personality (ONLINE) Psychology 341: Abnormal Psychology Psychology 501: Legal, Ethical and Professional Issues in Clinical (Graduate Level Course)
Spring, 2010	<u>California State University, Fullerton, Instructor</u> Psychology 561: Psychological Assessment (Graduate Level Course) Psychology 331: Psychology of Personality (ONLINE)
Fall, 2009	<u>California State University, Fullerton, Instructor</u> Psychology 331: Psychology of Personality (ONLINE) Psychology 341: Abnormal Psychology Psychology 501: Legal, Ethical and Professional Issues in Clinical (Graduate Level Course)
Spring, 2008	<u>California State University, Fullerton, Instructor</u> Psychology 561: Psychological Assessment (Graduate Level Course) Psychology 520T: Trauma, Violence, & Victimization (Graduate Level Course) Psychology 341: Abnormal Psychology
Fall, 2007	<u>California State University, Fullerton, Instructor</u>

Psychology 331: **Psychology of Personality**
Psychology 501: **Legal, Ethical and Professional Issues in Clinical**
(Graduate Level Course)

Fall, 2007 Florida International University, Adjunct Instructor
Psychology of Personality (ONLINE COURSE)

Summer, 2007 Florida International University, Adjunct Instructor
Psychology of Personality (ONLINE COURSE)
Abnormal Psychology (ONLINE COURSE)

Spring, 2007 California State University, Fullerton, Instructor
Psychology 561: **Psychological Assessment** (Graduate Level Course)
Psychology 341: **Abnormal Psychology**

Florida International University, Adjunct Instructor
Psychology of Personality (ONLINE COURSE)

Fall, 2006 California State University, Fullerton, Instructor
Psychology 331: **Psychology of Personality**
Psychology 501: **Legal, Ethical and Professional Issues in Clinical**
(Graduate Level Course)

Spring, 2006 California State University, Fullerton, Instructor
Psychology 331: **Psychology of Personality**
Psychology 561: **Psychological Assessment** (Graduate Level Course)

Fall, 2005 California State University, Fullerton, Instructor
Psychology 331: **Psychology of Personality**
Psychology 501: **Legal, Ethical and Professional Issues in Clinical**
(Graduate Level Course)
Psychology 520T: **Trauma, Violence, & Victimization** (Graduate Level
Course)

Spring, 2005 California State University, Fullerton, Instructor
Psychology 331: **Psychology of Personality**
Psychology 561: **Psychological Assessment** (Graduate Level Course)

Fall, 2004 California State University, Fullerton, Instructor
Psychology 501: **Legal, Ethical and Professional Issues in Clinical**
(Graduate Level Course)
Psychology 331: **Psychology of Personality**

Spring, 2004	<u>California State University, Fullerton, Instructor</u> Psychology 331: Psychology of Personality Psychology 561: Psychological Assessment (Graduate Level Course)
Fall, 2003	<u>California State University, Fullerton, Instructor</u> Psychology 331: Psychology of Personality Psychology 501: Legal, Ethical and Professional Issues in Clinical (Graduate Level Course)
Spring, 2003	<u>California State University, Fullerton, Instructor</u> Psychology 331: Psychology of Personality Psychology 561: Psychological Assessment (Graduate Level Course)
Fall, 2002	<u>California State University, Fullerton, Instructor</u> Psychology 331: Psychology of Personality Psychology 501: Legal, Ethical and Professional Issues in Clinical (Graduate Level Course)
Winter, 1999	<u>University of Missouri-St. Louis, Instructor</u> Psychology 292: Psychology of Victimization
Fall, 1997	<u>University of Missouri-St. Louis, Instructor</u> Psychology 410: Women and Mental Health (Graduate Level Course)
Spring, 1995	<u>Southwest Missouri State University, Instructor</u> Office of Continuing Education Victimology Basic Certification Program Course: Sexual Assault and the Rapist
Winter, 1995	<u>University Of Missouri-St. Louis, Instructor</u> Psychology 292: Psychology of Victimization
Fall, 1993	<u>University of Missouri-St. Louis, Instructor</u> Psychology 392: Special topics in Psychology: Psychology and the Legal System.
Spring, 1988	<u>University of Illinois, Instructor</u> (graduate and undergraduate course) Psychology 368: Psychology and the law: Exploring the application of psychological knowledge to the study of psycholegal issues
Fall, 1987	<u>University of Illinois, Instructor</u> Psychology 368: Psychology and the law: Exploring the application of psychological knowledge to the study of psycholegal issues.

Spring, 1986 University of Illinois, Co-Instructor
 Psychology 368: **Psychology and the law:** Exploring the application of psychological knowledge to the study of psycholegal issues.

Clinical Experience and Supervision of Clinical Training

1998-2002 **Clinical Supervisor, Community Psychological Services Center, University of Missouri-St. Louis**

--Supervise psychology graduate students conducting psychological evaluations and individual therapy.

1992-2002 **Clinical Staff Member, Center for Trauma Recovery, University of Missouri-St. Louis.**

--Provided individual and group therapy for rape survivors using cognitive processing approach. Perform clinical assessments of physical and sexual assault survivors. Conduct crisis debriefing sessions in the community following traumatic, violent events, such as airline crashes and bank robberies. Supervise graduate students and post-doctoral fellows who provide individual and group therapy (since 1998).

1996-1997 **Post-Doctoral Fellow, Center for Trauma Recovery and Community Psychological Services Center, University of Missouri-St. Louis.**

--Supervised Post-Doctoral Clinical Training Program. Included individual and couples therapy, clinical and forensic assessment with trauma and non-trauma populations. Conducted assessments for the determination of disability.

1988-1990 **Correctional Center Clinician, Champaign County Correctional Center (on contract with the Mental Health Center of Champaign County, Illinois).**

--Provided evaluation, assessment, crisis intervention and brief psychotherapy to male and female jail residents. Co-facilitated a bi-weekly support group for female residents. Participated in training jail staff in mental health issues.

1982-1988 **Clinical Psychology Intern, Psychological Services Center, University of Illinois.**

Practica: Adult Individual Psychotherapy
 Forensic Evaluation
 Family and Marital Therapy
 Advanced Adult Individual Psychotherapy

1979-1980 **Rape Crisis Counselor, Cedars-Sinai Medical Center, Los Angeles, California.**

Selected Professional Activities

2015-current	Advisory Board, Family Violence Appellate Project
2014-current	Advisory Board Mind-Experts International
2012	Consultant, Office of Victims of Crime Technical and Training Assistance (OVC-TTA)
2012 (Feb.)	Grant Reviewer, United States Department of Defense (DOD), Congressionally Directed Medical Research Programs on PTSD.
2009	Nominated Distinguished Reviewer , <i>Psychology of Women Quarterly</i> .
2008 (Feb.)	American Psychological Association Legislative Advocacy Training. Selected to serve as Division 41 (psychology and law) representative. Will brief local congressional representative on violence against women issues.
2007 (Dec.)	Grant Reviewer, United States Department of Defense (DOD), Congressionally Directed Medical Research Programs on PTSD.
2002-2007	Editorial Board , Journal of Traumatic Stress
2003-2007	Associate Editor , Domestic Violence Reports.
July, 2004	Consultant to the Bureau of Justice Statistics on the development of a supplement to the National Crime Victimization Survey
2004-2006	Public Education Committee , International Society for Traumatic Stress Studies
2003-2006	Editorial Board , Psychology of Women Quarterly.
2003-2006	Editorial Board , Journal of Aggression, Maltreatment and Trauma.
Fall, 2002-current	Advisory Board, Women's Center: California State University, Fullerton
2000-2003	Board of Directors, Aid for Victims of Crime, St. Louis, Missouri
May-October 1999	Member of Missouri Governor Carnahan's Task Force for the Development of a Model School Crisis Response Plan.
April, 1999	Completed National Organization for Victim Assistance (NOVA) Advanced Training for Community Crisis Response
February 18-19, 1996	Participated in SCID training for the DSM-IV with Lynn Gladdis, Ph.D., trainer.

1995-1999	Conducted victim advocate training three times per year for the St. Louis City Prosecutor's Victim Advocate Program
1995-1997	Volunteer, St. Louis Anti-Violence Project. --Conducted volunteer and community education training, fundraising, and served as media spokesperson.
June, 1995	Invited Chair/Discussant for a panel at Law and Society Association Meeting, Toronto.
September 9, 1994	Completed the Sex Offender Evaluation Training Program, Institute of Law, Psychiatry and Public Policy, University of Virginia.
July, 1994 Program	Member of the Planning Committee for the Victimology Certification Basic Training Program Southwestern Missouri State University
June 14-15, 1994	Participated in the Law and Society Association's Graduate Student Workshop on the theme of "Representation." [Participants are selected by application]
July 13-17, 1994	Participated in the Law and Society Association's Summer Institute. Theme: "Every Day Practice and Trouble Cases." [Participants selected by application]
1993-1998	Coordinator, Center for Trauma Recovery Colloquium Series.
1993-1995	Member of Community-Based Jail Planning Task Force
February 22-24, 1993	Completed National Organization of Victim Assistance (NOVA) Community Crisis Response Team (CRT) Training Institute. Active Member of St. Louis CRT.
September-Oct, 1990	Completed the 54-hour clinical hypnosis training course conducted by the Virginia Hypnosis Society.
August, 1990	Completed the 48-hour Forensic Training Course at the Institute for Law, Psychiatry & Public Policy, University of Virginia.
1983-1985	Graduate Student Representative, Department of Psychology, University of Illinois
<u>Memberships:</u>	American Psychological Association International Society for Traumatic Stress Studies (ISTSS) American Psychological Association (Division 56 Trauma Psychology)

American Psychology Law Society (Division 41, APA)
The Psychology of Women (Division 35, APA)
Division of Media Psychology (APA)
APSAC (American Professional Society of Child Abuse)
Association of Threat Assessment Professionals
Los Angeles County Psychological Association

Ad Hoc Reviewer

Journals: Psychological Bulletin
Trauma, Violence, and Aggression
Law and Human Behavior
Journal of Interpersonal Violence
International Journal of Forensic Mental Health
Justice Quarterly
Psychological Assessment
Violence & Victims
Journal of Abnormal Psychology
Journal of Consulting and Clinical Psychology
Violence Against Women: An Interdisciplinary Journal
Journal of Aggression, Maltreatment and Trauma

Grants: United States Department of Defense, Congressionally Directed Medical
Research Grants, PTSD and Trauma.
City University of New York Intramural Research Grants
United States Government, Department of Justice/OJP, Violence Against
Women Office.
United States Government, Department of Veterans Affairs, Merit Review
Grants.
The Ontario Mental Health Foundation
Research Board, University of Missouri-St. Louis.

Conferences: Program Specialty Chair: American Psychology Law Society, 2007.
Reviewer, American Psychological Association Conference, Division of
Psychology and Law, 2008.
Program Specialty Chair: American Psychology Law Society, 2007.
Reviewer, Program Committee: American Psychology Law Society, 2005
Program Specialty Chair: American Psychology Law Society, 2005.
Reviewer, Program Committee: American Psychology Law Society, 2005.
Reviewer, Program Committee: Association for the Advancement of
Behavior Therapy, 1997.

Reviewer, Program Committee: American Psychology Law Society (APLS-Division 41) 1995 , 2002 Biennial Conferences.
 Reviewer, Program Committee: American Psychology Law Society (APLS-Division 41) Program for at the 2003 APA.
 Reviewer, Program Committee: American Psychology Law Society (APLS-Division 41) 2004 Biennial Conference Program.

Professional

Standards: National Victim Assistance Standards Consortium, invited reviewer for the development of professional standards of practice (2000).

Media Interviews

February, 1996	TV 30 (St. Louis) : Men who kill intimate female partners
March, 1996	St. Louis Post-Dispatch: Acquaintance rape
May, 1996	St. Louis Post-Dispatch: Domestic violence
July, 1996	St. Louis Post-Dispatch: Floods/domestic abuse
July, 1996	TV30 (St. Louis): 1993 Floods and domestic abuse
July, 1996	Radio News Service: domestic abuse/1993 Floods
July, 1996	TV 5 (St. Louis): Rohypnol and Date Rape
September, 1996	KWMU radio (St. Louis): Violence against women
November, 1996	TV 4 (St. Louis): Date rape drugs
December, 1996	Alpha Phi Quarterly: Date Rape
March, 1997	Riverfront Times (St. Louis): Domestic violence
September, 1997	TV 4 (St. Louis): Acquaintance Rape
February, 1998	Radio Interview-Metro News Wire Service: Domestic violence
February, 1998	Radio Interview-KWMU St. Louis on the Air: Domestic violence
March, 1998	Radio Interview-WILL: Domestic violence and child abuse
March, 1998	Radio Interview- KMOX: Domestic violence
March, 1998	Radio Interview-Newsbytes wire service: Domestic violence
April, 1998	Radio Interview-Missouri Net news wire service.
June, 1998	TV4 (St. Louis): Legislative Changes in Rape laws
July, 1998	TV 11 (St. Louis): Recovery from rape
October, 1998	TV 5 (St. Louis): Intimate Partner violence
October 1998	Newsbytes wire service (radio): Intimate partner violence.
October, 1998	TCI Cable TV: Intimate partner violence
October, 1998	UMSL Current: Intimate partner violence
February, 1999	TV 4: Stalking and domestic violence
February, 1999	Radio Interview-WILL: Stalking and domestic violence
February, 1999	Radio Interview-Missouri Net news wire service: Stalking and domestic violence
February, 1999	Radio Interview-Newsbytes wire service: Domestic violence and stalking
March, 1999	Radio Interview- KMOX: Rape and recovery
March, 1999	San Jose Star: Domestic violence
March, 1999	Newsbytes wire service (radio): Domestic violence
April, 1999	NYU-Date rape
April, 1999	Newsbytes wire service (radio): Littleton, CO School shooting

April, 1999	Radio Interview--KTRS : Littleton, CO School shooting
April, 1999	TV 2: Media and School violence
April, 1999	TV 30: Littleton, CO School shooting
April, 1999	KMOX : Littleton, CO School shooting/crime victims
April, 1999	TV 4 Eye on St. Louis: School violence/Crime Victim Rights
April, 1999	TV 5: School violence October, 1999
	Salon Magazine: Familial homicide
January, 2000	KMOX Radio: Rape
January, 2000	St. Louis Post-Dispatch: Relationship harmony & blood pressure
February, 2000	GHB: Date rape drug
February, 2000	AP Wire Service-Why men rape.
July, 2000	Mademoiselle Magazine: Dating violence
January, 2001	WILL Radio: Missouri Domestic Violence Legislation
April, 2001	Court TV: Stalking
July, 2001	St. Louis Post-Dispatch: Domestic homicide
July, 2001	St. Louis Post-Dispatch: Domestic violence and family murders.
September, 2001	NBC, North Carolina Affiliate: Domestic violence, stalking, and homicide.
September, 2001	KWMU Radio: Same-sex partner abuse.
September 2001	FOX 2 news: Impact of WTC tragedy.
September 2002	Chronicle of Higher Education: Human Research Participants and IRB's.
November, 2002	Independent Journalist: Ethical Issues in the Provision of Mandated Treatment of Offenders
October, 2005	CSUF Communication Studies Cable Access Show: Hurricane Katrina Effects
October, 2005	Pittsburgh Tribune Review: Stalking
June, 2006	Health Behavior News Service: Stalking
June, 2006	ABC News Radio, New York: Stalking
June, 2006	Associated Press: Celebrity Stalking
July, 2006	Stalking in the Bob Uecker case: LA Times/Lubbock Avalanche Journal
February, 2006	Daily Titan: School Violence
February, 2007	USA Today: Relationship Stalking
February, 2008	Family Homicide: KDOC TV
February, 2008	Family Homicide: Daily Titan
February 2007	USA Today: Stalking in the female astronaut case
November, 2009	Fort Hood Shootings, CNN
August, 2012	CNN Reporter Interview- Korean music fans and the "saesang" mind.
March, 2013	Orange County Register – Community Perceptions of Risk and Safety
November, 2015	Good Housekeeping Magazine – Emotionally Abusive Relationships
January, 2016	MTV News-Traumatic Impact of Violent Media Exposure
January, 2016	San Diego Reader, Battered Women Charged with Crimes
February, 2016	Washington Post, Stalking and Partner Homicide
October, 2016	Fox News Health.com: Sexual Assault: What Hinders Reporting?
February, 2017	Daily Titan: Sexual Assault
April, 2017	Daily Titan: Suicide and College students
June, 2017	Vice: Stalking and Gun Violence

October, 2017	Yahoo News: Sexual assault and harassment –Why victims come forward in cases of offenders with power and status.
October, 2017	Arizona State University, The State Press, Dating and Sexual Violence Among College Women
March, 2018	Secondary Traumatic Stress and Media Coverage of Mass Violence, The Trace
April, 2018	Therapies for Sexual Trauma, Good Morning America (digital edition)
November, 2018	PTSD and Violence, Los Angeles Times.
November, 2018	Emotional and Psychological Abuse in Relationships, Prevention.com
December, 2018	Sexual Assault, Daily Titan

Academic Honors and Awards

Violence Against Women (journal) nominated, Best Research Paper of the year (2008)
American Association of Trial Consultants Paper Competition Award (2000)
American Psychology Law Society Dissertation Award (1996)
American Psychology Law Society (APLS-Division 41)
(Grant-In-Aid to support dissertation)
Society for the Psychological Study of Social Issues (SPSSI)
(Grant-In-Aid to support dissertation)
Graduate College Dissertation Fellowship, University of Illinois
Department of Psychology Dissertation Grant, University of Illinois
Graduate College Thesis Grant, University of Illinois
Graduate College Travel Grant, University of Illinois
National Institute of Mental Health Clinical Traineeship
President's Undergraduate Fellowship
B.A., Magna Cum Laude
Psychology honor's program/award of honor's on undergraduate thesis
Pi Gamma Mu, social science honor society

MECHANIC DECLARATION: EXHIBIT B
List of Documents Reviewed

- U.S. District Court Superseding Indictment, US v. Elizabeth Holmes and Ramesh, “Sunny” Balwani, CR-18-00258-EJD, 9/06/18;
- Iphone Notes from Elizabeth Holmes’s phone;
- Email exchanges between Elizabeth Holmes and Sunny Balwani;
- Santa Clara Police Department Records, 10/05/03, rape;
- First Class American Airlines ticket receipt for trip to NY;
- Ticketmaster receipt for Rent in NYC;
- Skype transcripts of conversations between Elizabeth Holmes and Sunny Balwani;
- SMS and iMessages between Elizabeth Holmes and Sunny Balwani;
- Handwritten notes by Sunny Balwani to Elizabeth Holmes, with sections entitled, “Non-Negotiables (people), “Pursuit of Success in Business;”
- Photograph of Elizabeth Holmes and Sunny Balwani;
- Family photograph of Elizabeth Holmes;
- College photograph of Elizabeth Holmes;
- Photograph of Elizabeth Holmes wearing a Stanford shirt, Sunny Balwani and unknown male;
- Photography of Elizabeth Holmes packing a suitcase;
- Card from Sunny Balwani to Elizabeth Holmes;
- Email from Christian Holmes to Sunny Balwani, forwarded to Elizabeth Holmes;
- Medical records from Keck School of Medicine-USC, Elizabeth Holmes, 8/02/09;
- Undated handwritten note from Sunny Balwani to Elizabeth Holmes;

MECHANIC DECLARATION: EXHIBIT C
List of Citations

- Afifi, T.O., MacMillan, H., Cox, B.P., Asmundson, G.J.G., Stein, M.B., & Sareen, J. (2008). Mental health correlates of intimate partner violence in marital relationships in a nationally representative sample of males and females. *Journal of Interpersonal Violence*, 24, 1398-1417.
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